Medway Council Development Plan Strategy Consultation 2018

Q1. Thinking about our approach, the scenarios and the development strategy section, please answer the following question.

When developing the Local Plan what things do you think the council should consider about the scale of the development needed to support Medway's growth and provide sustainable development?

The Council is considering objectively assessed needs in the context of the NPPF and housing projections published by the department for Communities and Local Government should provide the starting point estimate of overall housing need. The recent housing white paper fixing our broken housing market (February 2017) reaffirms the Governments commitment to significantly increased levels of housing delivery to meet widely recognised acute housing shortfall.

Paragraph 1.29 of the housing white paper sets out that plans should put in place policies to allow a good mix of sites to come forward for development to support small and medium sized sites and thriving rural communities. Ensuring there is a choice for consumers and that places can grow in ways that are sustainable.

There should be an emphasis on sustainable sites which relate well to existing infrastructure in particular public transport, making good use of the railways as well as bus services.

Ds1a Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?

No

Ds1b Please explain why you think proposed spatial development strategy does / doesn't represent the most sustainable approach to managing Medway's growth

There are opportunities to identify other smaller sites and in particular to support some of the services and facilities for the smaller settlements such as Cuxton where no sites are identified. Some village expansion has been shown on the Hoo Peninsular. There are other opportunities to the south close to the M2 and A2 corridor as well as those sites identified within the main settlements.

Ds1c What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

With the Government requiring Local Authorities to identify greater housing growth every opportunity should be taken to allow for a reasonable level of housing within the sustainable smaller settlements, notwithstanding the identified large growth areas.

Q2.Thinking about the Housing section of the Development Strategy, please answer the following question.

When developing the Local Plan what things do you think the council should consider to meet Medway's housing needs?

The Council should allow for full range of housing tenure as set out in the strategic housing market assessment of 2015. There should be the right balance of affordable housing and flexibility for specialist housing growth including the full range of elderly persons accommodation from retirement housing, assisted living, specialist nursing homes including dementia care.

The emerging document identifies the needs for specialist residential accommodation including people with learning disabilities and those with clinical mental ill health issues.

With respect to older people it is advised that although Medway's population is predicted to increase by a fifth over the next 20 years growth in the elderly is most significant, identified that over 65's counts for just over half of the overall population growth in Medway with an extra 31,000 older residents by 2035.

Downsizing is a factor which makes an important contribution to overall housing supply and there must be greater emphasis on providing for smaller units and opportunities for supported housing.

With the Medway Towns affordability as with many of the outer edge Boroughs within good commuting distance of London remains a key issue. Thus opportunities for self-build and self-build site allocations will become of increasing importance.

The Government did identify the opportunities for starter homes as contributing towards affordable housing although this has not been taken further at National Policy level as yet but the Medway Council should make suitable provision.

Nick Pryor

JTS Partnership

Protecting theatres
for **everyone**

Theatres Trust

Ref.: TC/8150

25 June 2018

Planning Policy Team
Regeneration, Culture, Environment and Transformation
Medway Council
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By e-mail: futuremedway@medway.gov.uk

Medway Council Local Plan 2012-2035 Development Strategy Regulation 18 consultation report & Draft Medway 2035

Thank you for consulting Theatres Trust on the above documents. Please find our comments outlined below.

Draft Medway 2035

Medway: The Place for Success (p8)

The document states there are two theatres within the borough, whereas our records suggest three active theatres – Brook, Central and Medway Little Theatre.

Medway – A great place to live (p13)

We welcome that the borough's excellent range of leisure and cultural facilities have been recognised as factors supporting the attractiveness of the area.

Destination and placemaking – Chatham – heart of the city (p31)

We support a greater range of landuses within Chatham's centre to promote an enhanced range of leisure opportunities to boost the daytime and evening economy. However, we would urge that any masterplanning exercise should direct new development (particularly residential) sensitively so as to avoid conflict with existing noise-generating uses (such as the town's theatres) as well as any emerging clusters of evening and night time activity.

Transforming Medway's Waterfront (p39)

We support the potential for new cultural and event space within Chatham Waterfront, and

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Chair Tim Eyles **Director** Jon Morgan
Trustees Richard Baldwin, David Blyth, Pam Bone, Paul Cartwright, Paddy Dillon, Ruth Eastwood, David Ian, Richard Johnston, Gary Kemp, Dara Ó Briain, Simon Ricketts, Peter Roberts, Ann Skippers, Anna Stapleton

The National Advisory Public Body for Theatres
The Theatres Trust Charitable Fund co-operates with Theatres Trust, has the same Trustees and is registered as a charity under number 274697

recommend the Council engages with the Trust at an early stage for design and operational advice should such provision include a purpose-built theatre or other such multi-purpose arts venue.

Medway Council Local Plan 2012-2035 Development Strategy

Developing a Vision for 2035

We welcome the Council's desire for transformation of the waterfront and town centres into attractive locations for homes, jobs, leisure and cultural activities as well as a reduction of inequality in health, education, economic and social opportunities. The provision of theatres and other facilities which offer opportunities for inclusion and participation in cultural activities and performance can help achieve these objectives as well as attract and retain talent within the local area. Paragraph 2.39 alludes to this, with the draft Medway 2035 document setting a consistent framework to help deliver on this vision.

Policy E3: Tourism

Paragraph 5.39 recognises the importance of an attractive environment and supporting the evening and night-time economy to help draw people into the area and that is reflected within the text for Policy E3, which we support.

Policy RTC1: Tourism: Retail Hierarchy & Policy RTC: 5: Role, Function and management of uses in centres – Frontage

We support Chatham as the Principal Town Centre to help achieve the outcomes we have supported in other sections of our response. This is further reflected within Policy RTC5, which provides an approach which is consistent by supporting the provision of uses conducive to developing an evening economy. A broader range of uses can help enhance the attractiveness and viability of the town centre.

Policy HC2: Community Facilities

We welcome the inclusion of cultural facilities within this policy as described in paragraph 9.13, an approach which is consistent with the NPPF. We consider Policy HC2 to provide robust protection of valued facilities by virtue of the criteria set out in paragraphs 9.20 to 9.22.

Conclusion

In conclusion, we are supportive of the direction taken by your new Local Plan in terms of planning for culture and enhancing your town centres, particularly in relation to broadening the mix of uses in Chatham and its waterfront. There is a consistent narrative and approach taken by the Development Strategy and Medway 2035 document.

Should you require any assistance with the drafting of policies and content relating to cultural

facilities please do not hesitate to contact us. We otherwise look forward to further engagement on your new Local Plan and Medway 2035 as they are developed.

[redacted]

Tom Clarke MRTPI
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Consultation on Regulation 18 Development Strategy Consultation

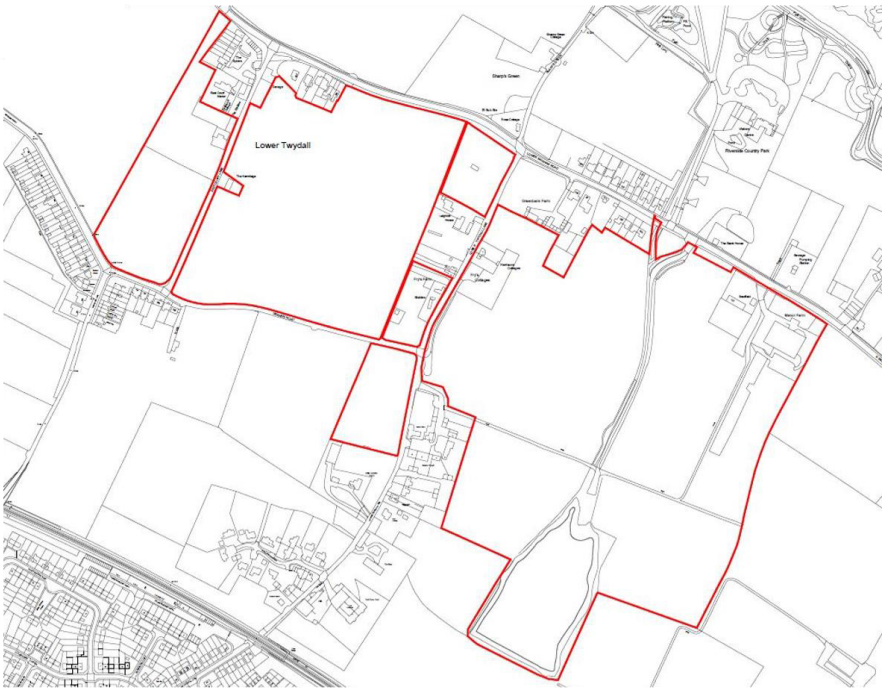
Land South of Lower Rainham Road, Lower Twydall, Gillingham, Kent

Prepared for:

Catesby Estates

Prepared by:

Savills (UK) Limited
74 High Street, Sevenoaks, TN13 1JR



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1. Executive Summary

1.1. These representations are made to the Medway Council Development Strategy Consultation on the Emerging Medway Local Plan "Future Medway". The Plan will replace the adopted Local Plan 2003, and covers the period 2012 – 2035. The consultation period closes on Monday 25th June 2018.

1.2. The Development Strategy Consultation represents the third consultation in the development of the emerging Future Medway Local Plan, with Medway having undertaken a Development Options consultation in early 2017, and an Issues and Options consultation in early 2016.

1.3. These representations are submitted on behalf of Catesby Estates, who seek to promote Land South of Lower Rainham Road, Gillingham for residential development. The Land, as outlined in red on the Location Plan (see Appendix 1), would provide an excellent and sustainable opportunity for additional housing provision in Medway, helping to ensure that Medway can, at the very least, meet the housing needs of the community whilst ensuring that the Emerging Future Medway Local Plan meets the objectives of the NPPF to boost significantly the supply of housing.

1.4. The entirety of the site is located within an Area of Local Landscape Importance. The south of the site is also immediately adjacent (but not within) the Lower Twydall Conservation Area. A designation, denoting the Boundary of Tidal Flood Area, intrudes into the northern boundary of the site, however the entirely of the site is located within Flood Zone 1 (representing the lowest risk of fluvial flooding). The Riverside Country Park is located immediately to the north of Lower Rainham Road. No other policy designations impact upon this site, and it is therefore relatively unconstrained.

1.5. The Development Strategy Consultation 2018 has set out four development scenarios in which future growth could be pursued over the life of the emerging Plan. Three of these scenarios seek to meet the OAN as determined in 2015. One scenario seeks to deliver close to the Local Housing Need determined by the standardised methodology.

1.6. In all scenarios, the Council are aiming to meet a significant proportion of this need at the Hoo Peninsula. This would require significant investment in infrastructure to increase the capacity of transport networks, utilities, and local services. The delivery of this infrastructure will take a considerable length of time, and it is therefore unlikely that the short term need for housing can be met at this location.

1.7. Medway Council has developed a revised Sustainability Appraisal to accompany the Development Strategy Consultation. The purpose of the Sustainability Appraisal is to identify and report on the likely significant effects of the Plan. This has appraised scenario 2 [development at the Hoo Peninsula] favourably, and scenario 3 [meeting the standardised methodology] poorly.

1.8. Well located Strategic Urban Extension (SUE) sites such as at Land of Lower Rainham Road, present an ideal solution to the need to deliver sustainable, short term and long term residential development. The site has excellent links to public transport, as well as existing commercial facilities. It would therefore be in the interests of proper planning to allocate the site within the Future Medway Local Plan.

2. Introduction

2.1. On behalf of our client, Catesby Estates ("our Client"), Savills is responding to the Development Strategy Consultation on the emerging Medway Local Plan "Future Medway". The Consultation closes on Monday 25th June 2018 and is the third stage of the consultation process for the emerging Plan. Medway anticipates that the Emerging Plan will be adopted in 2020.

2.2. The National Planning Policy Framework (NPPF) requires local planning authorities (LPAs) to plan positively, seeking new opportunities for development that can meet the identified needs of their respective District or Borough. Sufficient flexibility must be applied to allow for rapid change. To achieve this, LPAs must have an up-to-date Development Plan that has been informed by an extensive evidence base, formed of various technical studies and reports that have been through a rigorous consultation process and justify the proposals within the Emerging Plan.

2.3. To support the Emerging Plan, Medway has published a number of evidence base documents, including:

- Strategic Housing Market Assessment (November 2015)
- Sustainability Appraisal – Appraisal of development Scenarios and draft policies (April 2018)
- Strategic Land Availability Assessment (January 2015)
- Local Character Assessment (March 2011)

2.4. This list is not exhaustive, and where relevant, the various evidence base documents will be reviewed as part of this representation.

2.5. Medway is the second largest urban area in the South East after Brighton & Hove, with good commuter routes throughout. As a result, the Borough is growing rapidly, and there is a need to ensure that there is sufficiently flexibility in Medway's housing strategy to ensure that such rapid change can be accommodated. The Strategic Housing Market Assessment (November 2015) (SHMA) demonstrated an Objectively Assessed Need for 32,025 dwellings over a 25 year period (2012 – 2037), equating to 1,281 dwellings per annum.

2.6. Since the publication of the SHMA, the government has introduced a standardised methodology for calculating housing need as part of revisions to the NPPF. The outcomes from this will be used to inform housing strategies in Plans submitted to the Secretary of State six months after the date of the final Framework's publication. This is expected to be towards the end of Summer 2018. It is therefore likely that Medway Council will be subjected to the proposed uplift in the housing requirement. The assessed housing need in Medway on the basis of the standardised methodology amounts to 1,665 dwellings per annum. This is a considerable target and one which will require Medway to identify further appropriate, developable and suitable sites that could be brought forward in the Emerging Plan.

2.7. This representation is divided into the following sections:

- Section 3: The Site and Development Opportunity
- Section 4: Site Proposals
- Section 5: The Development Strategy

- Section 6: Sustainability Appraisal
- Section 7: Evidence Base
- Section 8: Summary and conclusions

2.8. Savills reserves the right to comment further on any of the above documents, or those included in the consultation at a later date, where applicable to representations that may be made before adoption of the Emerging 'Future Medway' Local Plan.

3. The Site and Development Opportunity

The Site

3.1. The site comprises of a number of parcels located south of Lower Rainham Road (B2004) and north of the Chatham Main Railway Line. This can be viewed at **Appendix** 1. The area being promoted consists mainly of arable farmland and open fields laid to grass. These are typically defined by either hedgerows surrounding the site, or the network of roads which run either through, or adjacent to the site. The site comprises an area of approximately 32.3ha (79.8 acres). Access to the site can be achieved principally via Lower Rainham Road to the north (as is presently the case for most of the site), but also via Lower Twydall Lane, Eastcourt Lane and Grange Road.

3.2. The majority of the site is bordered by Lower Rainham Road to the north, but in part by existing residential dwellings. The east of the site is bordered by open fields separated by hedgerows, and to the south east of the site by an open field, also separated by hedgerows. The south west of the site is mainly defined by Grange Road, other than at the rectangular plot of land where Grange Road meets Lower Twydall Lane. The western boundary of the site is defined by a wooded area located west of Eastcourt Lane.

3.3. The entirety of the site is located within an Area of Local Landscape Importance. The south of the site is also immediately adjacent (but not within) the Lower Twydall Conservation Area. A designation, denoting the Boundary of Tidal Flood Area, marginally intrudes into part of the northern boundary of the site, however the entirely of the site is located within Flood Zone 1 (representing the lowest risk of fluvial flooding). The Environment Agency have recently updated their flood zone maps, and it is therefore rational to assume that this a more accurate and up-to-date position. The Riverside Country Park is located immediately to the north of Lower Rainham Road.

3.4. An extract of the proposals map is shown below:

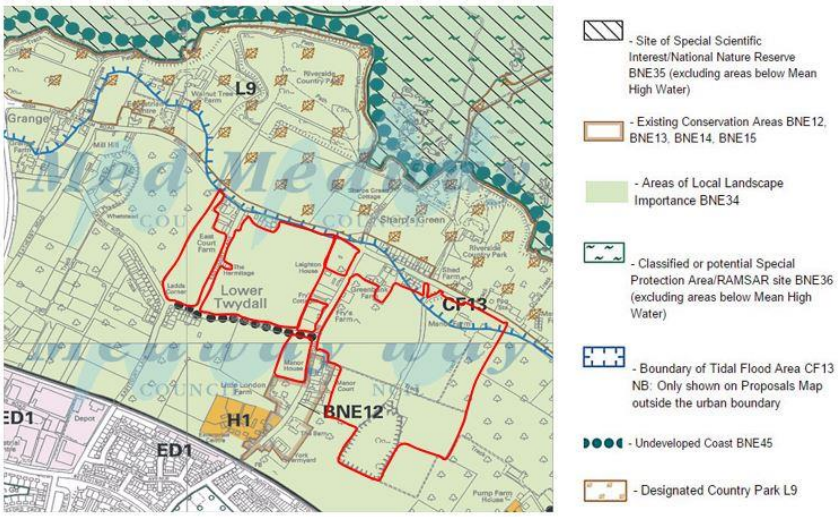
L9
Grange
Lower Twydall
CF13
H1
BNE12
ED1
ED1
- Site of Special Scientific Interest/National Nature Reserve BNE35 (excluding areas below Mean High Water)
- Existing Conservation Areas BNE12, BNE13, BNE14, BNE15
- Areas of Local Landscape Importance BNE34
- Classified or potential Special Protection Area/RAMSAR site BNE36 (excluding areas below Mean High Water)
- Boundary of Tidal Flood Area CF13 NB: Only shown on Proposals Map outside the urban boundary
- Undeveloped Coast BNE45
- Designated Country Park L9

Figure 1: Proposals Map (site outlined in red)

3.5. There are no listed buildings within the boundary of the site, however there are a number of listed buildings that are located in close proximity to the site. The majority of these are associated with buildings within the Lower Twydall Conservation Area. These are as follows:

- Manor Barn and Attached North and West Walls (Grade II, UID: 1259709)
- Twydall Barn and Attached Wall (Grade II, UID: 1259714)
- Manor House and Attached Garden Wall (Grade II, UID: 1259712)
- Little London Farmhouse (Grade II, UID: 1259706)
- York Farmhouse (Grade II, UID: 1259716)
- Bay Tree Villa (Grade II, UID: 1259731)
- The Black House (Grade II, UID: 1267773)
- East Court Farmhouse (Grade II, UID: 1267781)

3.6. These buildings are not positioned in such a way that obstructs the future development potential of the site.

3.7. No other policy designations impact upon this site, and it is therefore relatively unconstrained. This is demonstrated by Figure 1 above.

4. Site Proposals

4.1. This representation proposes that the site is allocated in the Emerging Local Plan for 610 dwellings. This would include a provision of affordable housing in line with emerging local policy as well as:

- Playing Fields (2.24ha) and Public Open Space
- Allotments
- Enhanced Public Transport Facilities
- Designated space for a Primary School, if required.

4.2. A Masterplan Concept Sketch has been prepared to support this representation and can be found in Appendix 2. A smaller version of this sketch can be seen below. As is clear from the Plan, the site can easily accommodate this level of development without appearing unduly cramped or overdeveloped, whilst also providing the necessary social and green infrastructure.

4.3. At this stage, the Masterplan Concept Sketch is provided as a means of highlighting The Site's development potential and forms a basis for discussion purposes. Our Client would be please to liaise with both the planning policy team and development management officers to secure an acceptable and sustainable scheme for this parcel of land.

4.4. Further details can be found within our delivery document which has been submitted alongside this representation.

4.5. As well as the addition of much needed housing, Land South of Lower Rainham Road could also include a new primary school to accommodate both new and existing demand within Rainham.

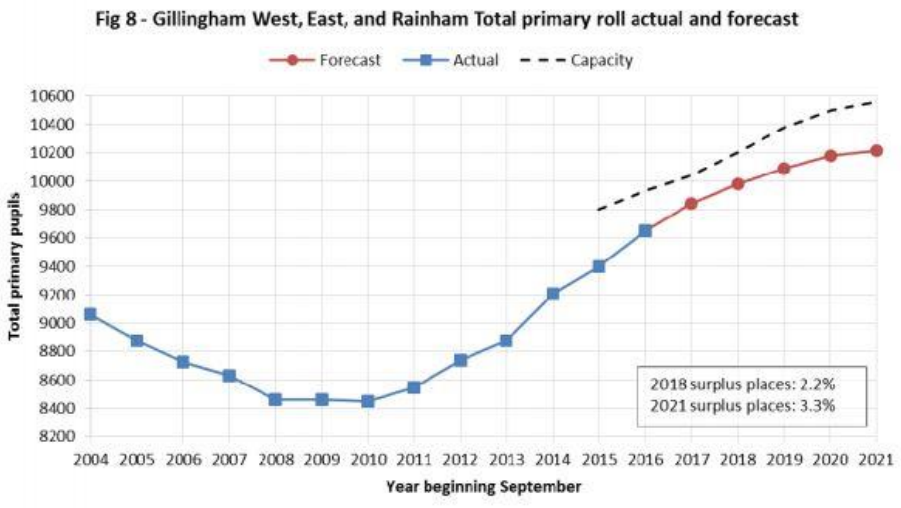

Figure 2: Primary School roll – actual and forecast

4.6. The addition of new primary school capacity within Medway is reliant upon new housing development coming forward. As can be seen above, surplus school places in 2021 with planned growth in Gillingham and Rainham will still be as little as 3.3%. It is therefore clear that a further primary school would be of benefit to these areas moving forward. We are however aware that adjoining landowners may also be including the provision of a primary school in their site promotion so clearly we would expect to have discussions at the appropriate stage as to where it may be best to locate the school.

5. The Development Strategy

5.1. The Development Strategy Consultation represents the third consultation undertaken as part of the preparation of the emerging Local Plan. This follows the Issues and Options consultation undertaken in early 2016, and the Development Options consultation undertaken in early 2017. The Development Options consultation in 2017 set out four development scenarios in which future growth could be accommodated over the life of the emerging Plan. These are set out below.

Development Options Consultation 2017 (concluded April 2017)

5.2. Scenario 1 – 'maximising the potential of urban regeneration': This scenario considers the merits of employment, commercial and mixed use development that would contribute towards the regeneration of waterfront sites. The focus on regeneration and transformation or urban centres in this scenario is based on the idea that development will come forward on sites that have already been subject to development.

5.3. Scenario 2 – 'Suburban expansion': This scenario retains a core element of scenario 1 (promoting urban regeneration), but includes a focus on suburban development to complement a strengthened urban core by meeting the shortfall of development needs elsewhere.

5.4. Scenario 3 – 'Hoo Peninsula Focus': This scenario places a heavy emphasis on urban regeneration at waterfront locations, with a particular focus on the Hoo Peninsula, and to a lesser degree at Rainham.

5.5. Scenario 4 – 'Urban Regeneration and a Rural Town'. This scenario consolidates all scenarios presented above, bringing together components of urban regeneration, suburban expansion and rural development.

5.6. In reviewing the options available to positively prepare a plan for Medway's sustainable growth, Medway has progressed plans beyond those prevented in the Development Options consultation last year, following a greater evidence base of technical documents assessing key matters. The four scenarios set out in the current consultation are outlined below.

Development Strategy Consultation 2018

5.7. Scenario 1 – Meeting Objectively Assessed Need: This scenario seeks to direct growth to brownfield sites and to realise the potential of regeneration. This continues with objective of regenerating waterfront sites, together with opportunity areas in and around town centres. This approach complements urban regeneration with the development of a rural town and some suburban expansion. This would not include development at Lodge Hill, nor does it include removal of land from the Green Belt.

5.8. Scenario 2 – Investment in infrastructure to unlock growth: This scenario includes the comprehensive development of land on the Hoo Peninsula, including the delivery of new services and infrastructure. The Hoo Peninsula would accommodate a greater volume of development, and sites in suburban areas where there are fewer opportunities to mitigate transport impact would see reduced levels of development. This scenario is otherwise similar to scenario 1.

5.9. Scenario 3 – Meeting the Government's proposed calculation of Local Housing Need: This scenario seeks to accommodate the local housing need as calculated through the Standardised Methodology. This would include the development of commercial land to residential uses to significantly boost the supply of housing. To meet the higher requirement, this scenario would require the reliance on the development of urban opportunity areas, and achieving high densities on appropriate sites. Suburban areas would also be subject to development.

5.10. Scenario 4 – Consideration of development within Lodge Hill SSSI: This scenario includes a 2,000 unit scheme at Lodge Hill, currently being programmed by Homes England. The development of this site would replace the need to release land in suburban areas. This scenario is otherwise similar to those in Scenario 1.

Land Supply Requirement	Number of dwellings
Scenario 1	
Total Supply	29,950
SHENA Objectively Assessed Housing Need (2015)	29,463
Buffer	487
Scenario 2	
Total Supply	31,033
SHENA Objectively Assessed Housing Need (2015)	29,463
Buffer	1,570
Scenario 3	
Total Supply	35,961
Standard Methodology Local Housing Need	37,143
Shortfall	1,182
Scenario 4	
Total Supply	30,569
SHENA Objectively Assessed Housing Need (2015)	29,463
Buffer	1,106

Figure 3: Meeting Local Housing Need in each scenario

5.11. It is clear from the table above that there is a very limited buffer for non-delivery of sites over the emerging Plan Period where Medway has planned to meet the SHENA OAN (scenarios 1, 2 and 4). Where Medway has planned to meet the requirement based on the standard methododology, there is a shortfall of 1,182 dwellings, however the total supply of dwellings supplied in absolute terms is considerably higher (scenario 3).

Objectively Assessed Housing Needs

5.12. It is evident from the Council's evidence base that the Objective Assessment of Housing Need, established in the Strategic Housing and Economic Needs Assessment 2015 (29,463 dwellings), is significantly lower than the calculated housing need from the standardised methodology (37,143 dwellings).

5.13. As stated in the emerging NPPF, in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method, unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals (Paragraph 61). No exceptional circumstances have been put forward in this consultation.

5.14. Relatively slow progress has been made in preparing the emerging Future Medway Local Plan and it has been over two years since the consultation on the Issues and Options consultation (February 2016). It is therefore rational to assume that Medway will be unable to submit a Draft Local Plan to the Secretary of State before the emerging NPPF is adopted. On that basis, the Council should apply the standard methodology and prepare a plan that meets the inflated level of housing need.

5.15. The Strategic Housing and Economic Needs Assessment has identified a need for 17,112 affordable dwellings over the Plan period. None of the four development scenarios (as outlined at paragraph 5.7) can accommodate for this need. It would therefore be prudent for Medway Council to plan to meet as much affordable housing need as possible, and this is best achieved through planning for a higher, more reflective housing need which can genuinely improve affordability within the authority.

5.16. The Strategic Housing and Economic Needs Assessment was published in 2015, and as such, does not consider the most recent population and household projections. It is therefore against the interests of proper planning, and in any case unwise, to prepare for housing growth on the basis of this assessment. This risks the plan being found unsound at examination.

Hoo Peninsula

5.17. Scenario 3 of the consultation aims to meet the level of housing need based on the standard methodology. Given that the Strategic Housing and Economic Needs Assessment is unable to calculate need based on the latest projections, the standard methodology would be an appropriate calculation on which to plan housing.

5.18. Medway plans to meet a significant proportion of this need at the Hoo Peninsula. This also forms the basis of scenario 2. This would require significant investment in infrastructure to increase the capacity of transport networks, utilities and local services to meet the growing needs. The delivery of such infrastructure will take a considerable length of time, and it is common place for local authorities to expect overly optimistic delivery times, leading to a failure in the delivery of housing delivery targets.

5.19. Medway Council has a history of failing to meet its housing targets. The table below highlights the lack of housing delivery since the beginning of the emerging Plan Period.

Net additional dwellings delivered since 2012			
	Completions	**Requirement**	**Surplus/deficit**
2011/12	809	1,000	191
2012/13	565	1,000	435
2013/14	579	1,000	421
2014/15	483	1,000	517
2015/16	553	1,000	447
2016/17	642	1,000	358
2017/18	639*	1,000	361
2011/12 – 2017/18	**4,270**	**7,000**	**2,730**

Figure 4: Net additional dwellings Medway 2012-2028

*Estimated with EPC data (11% non-implementation rate)

5.20. Medway adopted a housing requirement of 1,000dpa to be delivered between 2011-2035. This figure has been used to present the context for housing completions in the absence of an up-to-date Local Plan. Medway Council has been unable to meet this target since 2011, despite the target being 281 dwellings less than the OAN which forms the basis of housing targets within the emerging Plan. It is therefore important that Medway prioritise the delivery of housing in the short term to overcome the current shortfall. The long term delivery of dwellings at the Hoo Peninsula does not achieve this, however suitable SUE sites, such as Land south of Lower Rainham Road are able to supplement the absence of these units in the short term.

5.21. In the short term, there is limited access to the Hoo Peninsula, owing to its detachment from the built up areas of Medway. The A289 from Gillingham, and the A228 from Strood, do not have the capacity to accommodate significant levels of growth at the Hoo Peninsula, and therefore present a significant constraint. In addition, there is no railway station in the immediate vicinity that can serve the immediate and future growth of this area. The nearest railway station providing direct services to London is Strood Station (2.3 miles) and can only be reasonably accessed by car. This does not present sustainable development; a key objective of the National Planning Policy Framework.

5.22. On the basis of the above, development should be directed toward sustainable locations which can deliver housing quickly. This Land South of Lower Rainham Road is available now and can deliver 610 units which would be less than 1.5 miles from two, well connected railway stations.

6. Sustainability Appraisal

6.1. Medway Council has developed a revised Sustainability Appraisal to accompany the Development Strategy Consultation. The purpose of the Sustainability Appraisal is to identify and report on the likely significant effects of the Plan on the basis of an evolving sustainability framework. This consists of 14 objectives which are:

Category	#	Objective
Economic	1	Ensure equal access to education and skills at all levels
	2	Encourage suitable employment opportunities in accessible locations
	3	Establish a strong economic foundation to enable sustainable growth and competitiveness
	4	Protect and support growth and prosperity in the town centres
Environ-mental	5	Conserve and enhance the existing green and open space network
	6	Protect and enhance biodiversity features
	7	Reduced contribution to impacts of global climate change and localised pollution
	8	Adapt and mitigate impacts of climate change
	9	Promoting, enhancing and respecting historic/cultural heritage assets
	10	Making the best use of material assets
Social	11	Improve the health and wellbeing of residents in Medway and reduce health inequalities
	12	Promote resilience of communities by improving deprivation and promoting inclusive communities
	13	Reduce the levels, perception and fear of crime
	14	Provide a sustainable supply of housing to meet the housing requirements of the borough

6.2. The objectives have been appraised using the assessment criteria below:

Significance of effect	Description of effect
++	Significant positive
+	Minor positive
O	Neutral
-	Minor negative
--	Significant negative
?	Unknown

6.3. Medway has appraised all the development scenarios being consulted on (as summarised as paragraph 5.7 – 5.10). This includes Scenario 2 – 'Investment in infrastructure to unlock growth' and Scenario 3 'Meeting the government's proposed Local Housing Need' which have been assessed as follows:

SEA	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Short Term	+	+	+	-	?	?	+	-	?	-	+	+	+	++
Medium Term	+	+	+	-	?	?	+	-	?	-	+	+	+	++
Long Term	+	+	++	-	?	?	+	-	?	-	+	+	+	++

SA Summary Scenario 2 – Investment in Infrastructure to unlock growth

6.4. The sustainability appraisal assesses scenario 2 as having a negative impact on the prosperity of town centres, the impact on climate change and the use of material assets. Clearly, the negative impacts on these objectives can be, in part, attributed to the relatively remote location of the Hoo Peninsula.

6.5. The access to education, the creation of job opportunities in accessible locations, and the impact on the economy have been assessed positively in the appraisal. The delivery of these objectives is entirely dependent on heavy investment in transport coming forward, and therefore the identified benefits will not materialise in the short or medium term. Clearly, alternative locations will need to be brought forward in the interim period if this scenario is to be pursued.

SEA	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Short Term	?	-	-	?	?	?	-	-	?	-	+	?	O	+
Medium Term	?	-	-	?	?	?	-	-	?	-	+	?	O	+
Long Term	?	--	--	?	?	?	-	-	?	-	+	?	O	+

SA Summary Scenario 3 – Meeting government's proposed calculation of local housing need

6.6. The sustainability appraisal assesses scenario 3 as having a negative impact on the development of employment opportunities, the local economy, the impact on climate change, mitigation of climate change and the use of material assets. The scenario, which brings forward a considerable quantum of housing, is assessed as having a positive contribution to improvements in health and wellbeing of residents.

6.7. Whilst the impact on a number of objectives remain unknown, owing to a lack of clarity from Medway as to where new housing will be directed, it is entirely reasonable to assume that employment opportunities, environmental mitigation measures and social infrastructure will be delivered as part of any residential-led proposals. The quantity of such supporting infrastructure will be proportionate to the number of new homes delivered, and thus the delivery of housing to meet the government's proposed calculation will be of wider benefit to Medway.

6.8. Scenario 3 is likely to include significant development at the Hoo Peninsula, but shall also be complemented by suburban sites such as Land South of Lower Rainham Road. The development of such sites offers the opportunity to deliver sustainable housing in locations that are readily serviced by existing town centre facilities and have appropriate access to public transport infrastructure, but can make a further contribution to Medway with the delivery of additional infrastructure.

6.9. Land South of Lower Rainham Road is located in close proximity to Gillingham Station (1.4 miles) which offers direct services to both London Victoria and London St Pancras International in less than an hour. Rainham Station offers similar services to London and is located just over a mile from the site (1.1 miles). The site is also well served by bus stops along Lower Rainham Road (B2004) which offer direct routes to Gillingham and to Maidstone (route 131). In addition, as an entirely suitable SUE site, the site is located less than 600m from an industrial estate which includes a Co-Op supermarket, a McDonalds and an NHS Treatment Centre. Furthermore, there is a large business park which includes a wide variety of shops, including a large Tesco Extra which is less than 1.4m from the site.

6.10. The immediate access Land South of Lower Rainham Road has to such facilities makes it a sustainable option which can be delivered as part of Scenario 3. The site is available for immediate development and, unlike development proposed under Scenario 2, can deliver homes early on in the emerging Plan period.

7. Evidence Base

Strategic Land Availability Assessment

7.1. Medway most recently reviewed and assessed sites to inform the emerging Plan in January 2017. Only part of the site has been assessed. The areas that have been submitted to the Call for Sites process are shown below.

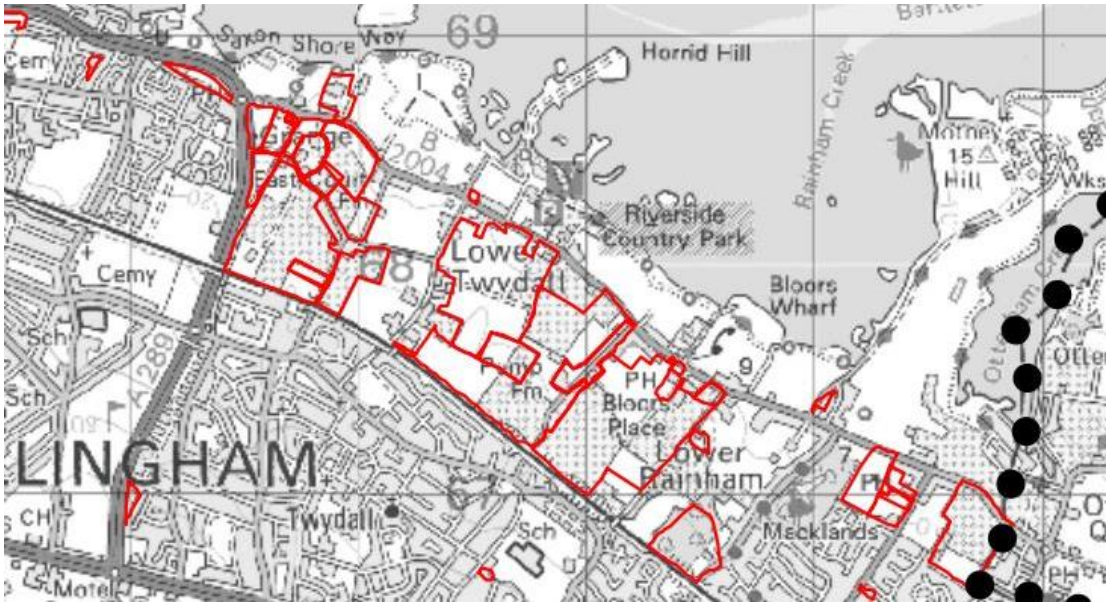

Figure 5: Assessed SLAA sites

7.2. The site was reviewed as part of the January 2017 SLAA under site reference 0778 and SO13. In both instances, the site has been determined as not being suitable. This can be seen below:

778	Manor Farm, Lower Rainham Road, Rainham	19.58	
SO13	Spatial Options – Land North of Grange Rd, Lower Twydall	5.00	

7.3. Site 0778 has also been the subject of a more comprehensive review in the 2015 SLAA. The SLAA determined that the site had the potential for the following development:

Development Potential		
Residential (units)	470	
Employment (m²)	Office	195,825
	Industrial	78,330
	Storage	78,330
Main Town Centre Uses (m²)		
Other uses		

7.4. Despite the site's development potential, the assessment considered it "unsuitable for development unless identified constraints can be addressed". This was based upon constraints concerning facilities and services availability, public transport accessibility, landscape and agricultural land. The Site, however, was not considered unsuitable for any constraints that specifically related to housing.

7.5. Furthermore, the site is assessed as being unavailable on the basis of a lack of active promotion and a lack of information regarding the landowner and his intentions.

7.6. Clearly we cannot agree with the findings of the SLAA (in respect of site 0778). There is no evidence to support the conclusions that the site has unresolvable constraints. These judgements are either wrong, or unduly pessimistic. In addition, the engagement of Catesby Estates by the landowners as the active site promoter for this site and the wider land adjacent to it demonstrate that it is available for development and the landowners are keen to engage in the process.

Landscape Character Assessment

7.7. The Site is located centrally within the Lower Rainham Farmland area (21). This forms part of the North Kent Fruit Belt Character area (KCA 2004). The North Kent Fruit Belt has generally experienced creeping urbanisation along roads and at edges of settlements. This has resulted in a declining landscape condition, diversity and local distinctiveness.

Figure 6: North Kent Fruit Belt (site broadly outlined in red)

7.8. The characteristics of the area are defined as flat with small to medium scale mixed farmland. There are considered to be some well managed areas of Orchard, shelterbelt, farm buildings, cottages and distinctive rural hedgebanks, but some neglected pockets of land and a busy road give the impression of a gradual trend towards suburbanisation in some localised areas. The landscape area is generally considered to have poor levels of accessibility with regards to east/west and north/south links to urban areas.

7.9. An urban extension to the north west of Otterham Quay Lane divides the Lower Rainham Farmland character area and adds to the increasingly urban and industrial feel east of Rainham.

7.10. We do not consider the site to be in-keeping with the character of the landscape due to its close ties to the urban form south of the site. Whilst some parts of the landscape area are used for agricultural purposes and have a rural feel to them. The site is in close proximity to the urban area of Twydall and is separated from Twydall by a railway line which disrupts the tranquil nature of The Site.

7.11. The site contributes to the increasing trend towards suburbanisation within this landscape area. Residential dwellings are already adjacent to the site and the site already accommodates some industrial uses. Furthermore, there is a sizeable boatyard to the north of the site which includes a large area of hardstanding used for boat storage.

7.12. As already discussed, the lack of general accessibility across the Lower Rainham Farmland area does not apply to this site. The existing access into the site from the B2004 means that access to the wider area of Lower Rainham Farmland and neighbouring urban areas including Gillingham town centre is easily achieved. Furthermore, the nearby bus stops provide direct routes to both Gillingham and Maidstone.

8. Summary and Conclusions

8.1. Savills, on behalf of our client, Catesby Estates Plc, is responding to the Development Strategy Consultation 2018 to promote Land South of Lower Rainham Road. This land is located in an ideal location for a Strategic Urban Extension and is not covered by any restrictive designations in terms of habitats or landscape. The site is readily deliverable and able to make a sizeable contribution to the significant level of housing need which exists within Medway.

8.2. Medway Council are undertaking the consultation on the basis of four scenarios, three of which accommodate for an Objectively Assessed Housing Need of 29,463 dwellings. The alternative scenario (scenario 3) plans for the standardised methodology of 37,143 dwellings.

8.3. Slow progress has been made in preparing the emerging Future Medway Local Plan to date. It is therefore not unreasonable to assume that Medway will be unable to submit a Plan for examination prior to the adoption of the emerging NPPF. On that basis, the Council should proceed with the Plan on the basis of the standardised methodology, and prepare a plan that can accommodate for the greater housing need.

8.4. At present, the Council are aiming to meet a significant proportion of this need at the Hoo Peninsula. This would require significant investment in infrastructure to increase the capacity of transport networks, utilities, and local services. The delivery of this infrastructure will take a considerable length of time, and it is therefore unlikely that the short term need for housing can be met at this location.

8.5. There is already a firm trend of underdelivery against housing targets and therefore a significant shortfall to catch up on. This, coupled with the significant increase in housing requirements brought about by the standard methodology means that Medway should be planning more boldly to accommodate a greater quantum of housing over the Plan Period and more particularly in the short and medium term.

8.6. Our clients land interests at Lower Rainham Road present an ideal solution to the need to deliver sustainable, short term and long term residential development within the district away from other more constrained areas. The site is wholly accessible and has excellent links to public transport, as well as existing commercial facilities. Accordingly given that this site is free from any significant constraints it should be allocated within the Future Medway Local Plan.

Appendices

Appendix 1
Location Plan

Appendix 2
Masterplan Concept

Nick Challis
Planner

[redacted]

Guy Dixon
Director

[redacted]

NORTH

0m 50m 100m

Lower Twydall

Sharp's Green

Greenbank Farm

Riverside Country Park

Manor Farm

Notes:

Suffix:	Date:	Description:	Drawn:	Checked:
-	-	-	-	-

Revisions:

Catesby Estates plc
part of Urban&Civic

Project Name:

GILLINGHAM
MEDWAY, KENT

Drawing Title:

CONTRACT PLAN

Scale:	Media/Orientation:	Drawn:	Checked:	Day/Month/Year:
1:2500	A2L	RSB	DH	16/02/2018

Project No.:	Drawing No.:
-	LL/001

D:\Catesby Site\All Publish Sites\Lower Twydall, Medway\Drawings\LL_001 - Constraints and Opportunities - Copy

June 2018

Vision Statement

Land at Lower Rainham

Catesby Estates plc

Land at Lower Rainham

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June 2018

Contents

Foreword

1. A new Kentish village at Lower Rainham
2. The site and its setting
3. Accessibility
4. Illustrative masterplan

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Foreword

From the hamlet of Lower Twydall to the nearby Riverside Country Park, Lower Rainham has a deserved reputation for being one of the most attractive places to live in north Kent. Whether it's the proximity of the River Medway afforded to the village centre and its eastern settlements, or the direct links to the public rights of way across the nearby arable land, Lower Rainham's residents enjoy the benefits of living alongside the Medway.

Catesby is committed to working with the local community to achieve locally distinctive 'place making'. This will enable the community wishes and infrastructure to be realised, whilst ensuring the best possible connections from the site to the rest of the village. We recognise the long term value which can be generated in committing to high quality public realm and initiatives which create strong and lasting communities. Most importantly, we believe in building much needed new homes that will respect and enhance their natural setting and this will be at the forefront of our design strategy at Lower Rainham. The scheme will be at an appropriate density with respect to existing nearby development, which means primarily houses with garages.

Chapel House, Pump Lane

Fields in the centre of the site

Historic brick wall on the edge of the conservation area

Courtyard development to the south of the site

1. A new Kentish village at Lower Rainham

Our aspiration is for a new Kentish village at Lower Rainham, that provides for a perfect blend of high quality housing which is in harmony with its natural and historic surroundings. Using the existing natural features of the site and setting as the framework for the emerging masterplan, the new neighbourhood would aim to include the following placemaking elements:

- **Full integration with the wider area, where key routes could provide highly sustainable access to both Lower Rainham and Lower Rainham railway station for pedestrians and cyclists**
- **Exploration of opportunities to cross the railway**
- **A high quality development which aims to reflect traditional local building styles**
- **New homes laid out in coherent groupings which reflects the character of local villages**
- **Sporting facilities in the form of a playing field cluster**
- **A masterplan design which features a network of linear green routes permeating the scheme on the alignment of the streams, hedgerows, tree belts and woodland groups**
- **The opportunity to provide a sustainable and productive place where orchards and allotments could be used to characterise the environment**
- **Distinctive street scenes running through the scheme characterised by a succession of evolving vistas**
- **Potential off-site improvements to the highway network**

A new Kentish Avenue and Village Green

Landmark building terminates the vista along the street

The opportunity to create a new informal avenue which terminates in a village green exists at Lower Rainham

Potential for a limited range of shops and services over looking the village green

Grass verges which gradually widen from the east to the west will have the feel of a traditional Kentish street similar to Tenterden , Faversham and Rochester

2. The site and its setting

The site lies in a broad corridor between Lower Rainham Road and the railway line which runs along the northern edge of Gillingham.

The site is within the countryside and is close to the Conservation Area at Lower Twydall. It is not subject to any landscape designations and is within Flood Zone 1, there is an area of Flood Zone 2 immediately to the north of Lower Rainham Road.

There are a number of listed buildings around the site but most of these are located in the Lower Twydall Conservation Area. Some are also located along Pump Lane in the south east.

In terms of vegetation, there are a number of hedgerows, tree groups and individual trees scattered around the site. Most of the mature hedgerows line either side of the lanes that permeate the site.

Rainham benefits from a wide range of local services and facilities, a supermarket, doctor's surgery, bank, village hall and a number of public houses and restaurants. The site is within close proximity to Rainham railway station and there are opportunities for new potential bus links.

The plan opposite shows the immediate context of the site including the flood risk areas associated with the River Medway, the conservation areas and the listed buildings.

G:\URBAN DESIGN\TENDERS . SPEC\Lower Rainham Catesby\Lower Rainham Designations 20/06/18
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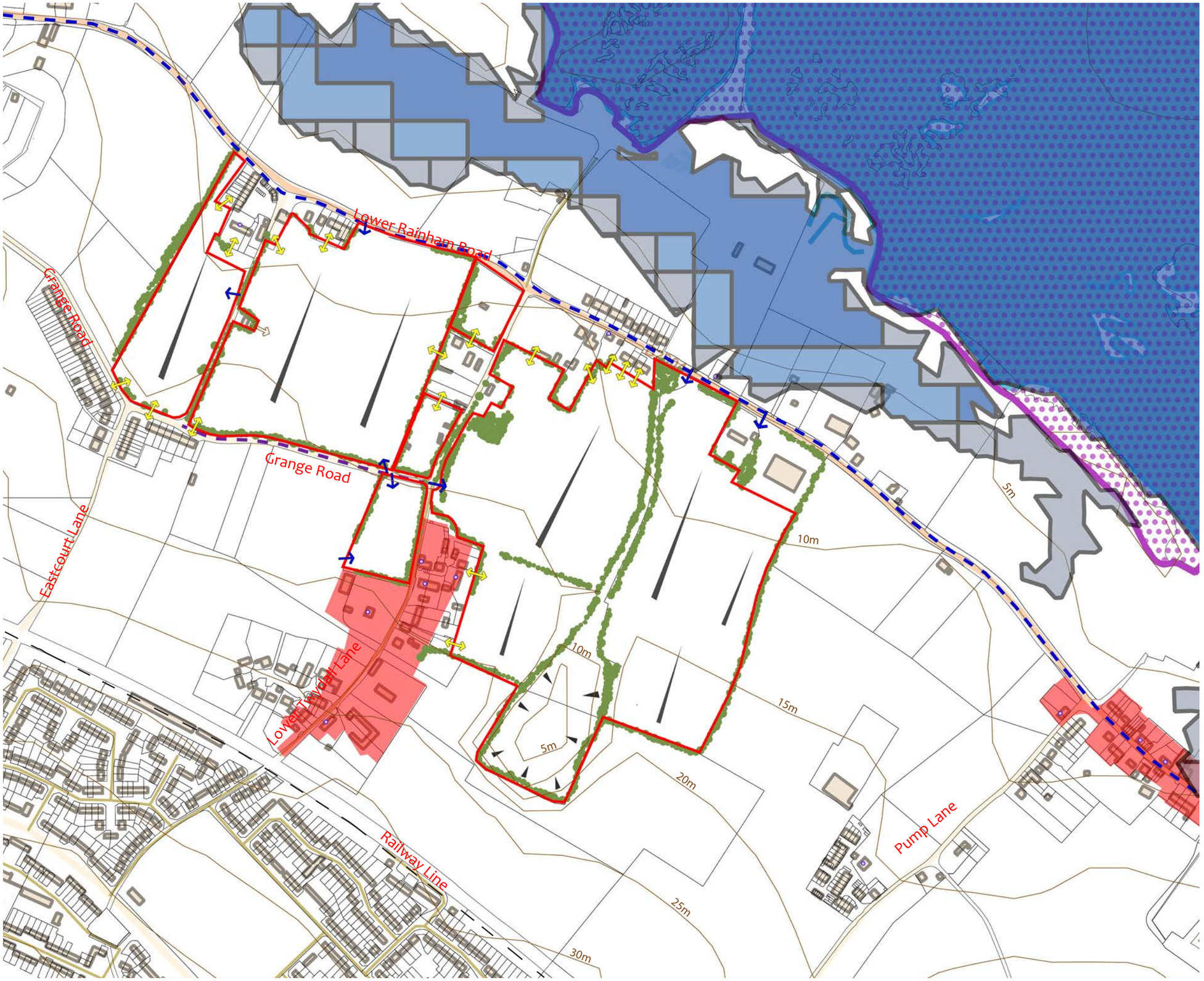
Designations and Features



- Conservation Area
- Scheduled Ancient Monuments
- Listed Buildings
- Existing Access
- Relationship with Adjacent Properties
- Built Form
- Contours (5m)
- Site
- High: Chance of Flooding Greater Than 3.3%
- Medium: Chance of Flooding Between 3.3% and 1%
- Low: Chance of Flooding Between 1% and 0.1%
- Trees On and Adjacent to Site
- Special Protection Area
- Rural Lane
- Lower Rainham Road (B2004)
- Slope (Pointing Down)
- Tidal Water

scale 1:5000 @ A3

savills

3. Accessibility

Public transport

Development at the Site provides the opportunity to contribute towards enhancing the provision of public transport within the Lower Rainham area.

This comprises:

- provision of new highway infrastructure for a bus route through the Site and linking Gillingham and Rainham railway stations
- designation of Lower Twdall Lane as a green corridor
- ensuring the layout of the Site brings all development within a 400 metre maximum walk distance of a bus route;
- the extension of existing bus services into the Site;
- provision of bus waiting facilities within the development; and
- potential provision of information technology at bus stops and key locations within the development area.

Importantly, the public transport proposals would be designed so that they integrated with, and embedded into the local context of the Lower Rainham and Gillingham area, thereby ensuring that the Site would be seamlessly accessible both for visitors and residents.

Pedestrian and cycle access

Development at the Site provides the opportunity to contribute towards enhancing the delivery of a comprehensive network of pedestrian and cycle routes and facilities both within the Site and Lower Rainham as a whole.

Pedestrian and cycle access could be achieved via routes comprising:

- Eastcourt Lane which is a quiet green lane that connects Grange Road and Lower Twydall Lane is suitable for both pedestrians and cyclists;
- A network of quiet streets and greenways which permeate through the site and connect to the Riverside Park in the north

Vehicle access

The location of vehicular access points has been considered having regard to physical constraints surrounding the Site and how these could influence the safe delivery of new highway access points. In particular, it is noted that Lower Rainham Road would me the main route to deliver vehicular access in this location.

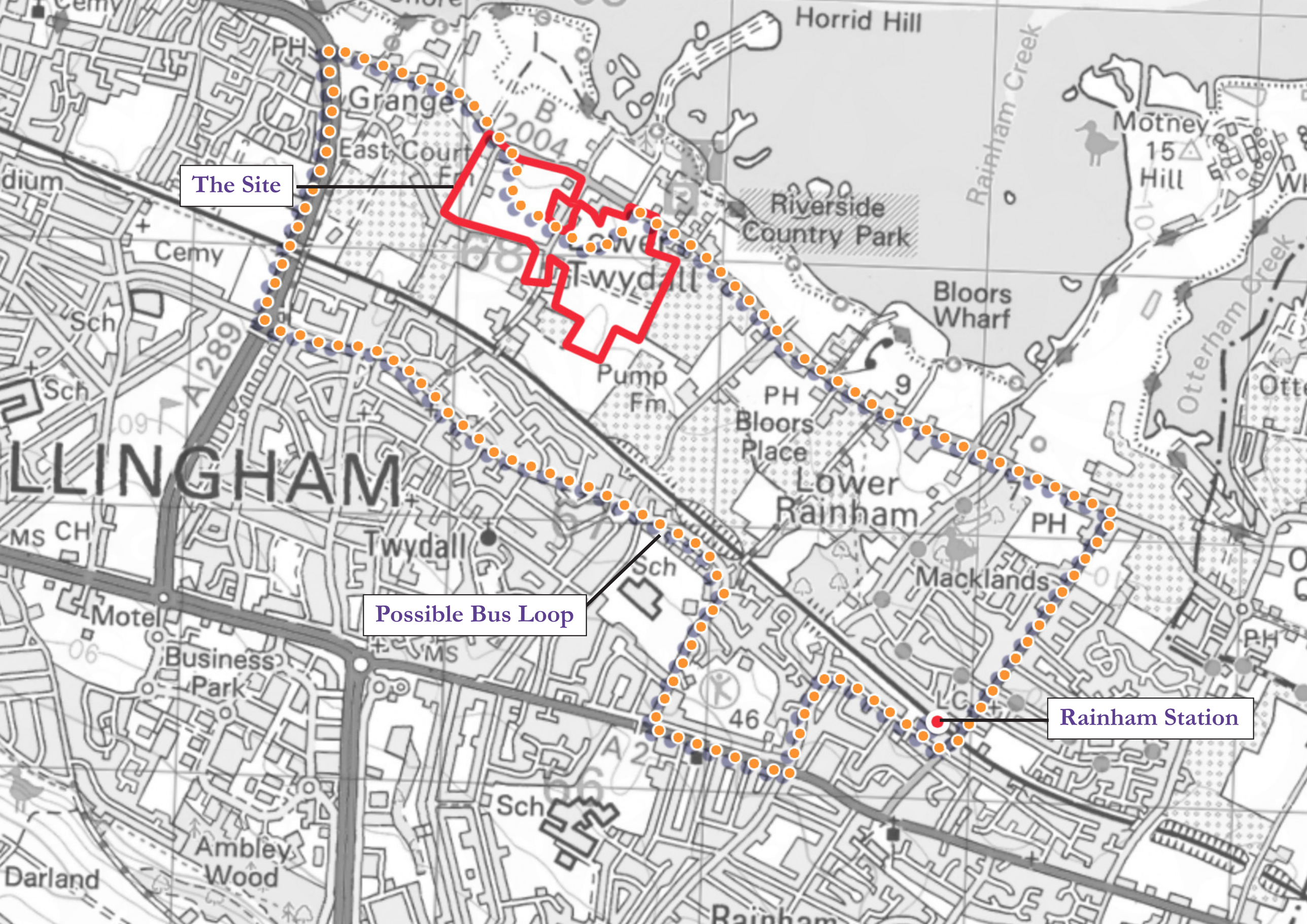
Two main vehicular access points to the Site would be provided. These would both take the form of simple priority junctions and be taken from:

- Lower Rainham Road

A secondary access point would also be provided prioritising pedestrians and cyclists. This would be taken from:

- Lower Twydall Lane.

The locations of the access points have been determined having regard to visibility and the necessary geometry to serve the Site and the current safety requirements in this respect.


The Site
Possible Bus Loop
Rainham Station
Horrid Hill
Rainham Creek
Motney Hill
Riverside Country Park
Bloors Wharf
Bloors Place
Lower Rainham
Grange
East Court Fm
Twydall
Pump Fm
Macklands
Twydall
Ambley Wood
Darland
Business Park
Motel
Cemy
Sch
PH
A289
A2
LLINGHAM

4. Illustrative masterplan

The design strategy for a new neighbourhood at Lower Rainham is underpinned by a responsive masterplanning strategy, which seeks to directly engage with the existing site features, for example:

- ensuring that new high quality homes are arranged in a manner which respects existing features such as the tree belts, individual mature trees and adjacent historic features.
- by aligning streets to create vistas to the country park or other landscape and townscape elements.
- by placing parks and open spaces in locations next to existing mature trees or enclosing spaces next to woodland.

The masterplan places particular emphasis on creating new place which effectively becomes a Medway riverside village.

Our key objective is to combine the character of the riverside setting and domestic gardens, with the sense of community of a new neighbourhood. It will be a neighbourhood that is clearly reflective of its locality and the distinctive natural and built elements of this part of North Kent will be woven into the fabric of the scheme. Major open spaces, front and rear gardens, green verges and parks will be brought together to create tranquillity and beauty. The design of houses, gardens, open space and community facilities will encourage social interaction, at the neighbourhood level.

At the heart of the scheme will be a 'village green' which will accommodate a children's play area and will be connected within the scheme and to the neighbouring street network. Attractive green routes will be provided along Lower Twydall Lane, Eastcourt Lane and Grange Road for easy access across the site for pedestrians and cyclists.

Building heights and densities will respond to this structure and be greatest along the main avenue through the site.

The new housing will be supported by an area of new allotments which could be situated in close proximity to the existing settlement.

Development details

At this stage of the assessments, the net residential area is 19ha, which at a low average density of 32 dwellings per hectare, would generate a housing yield of c. 610 units. A range of open space facilities would be provided including a cluster of playing fields on the former pit land in the south east and childrens play area on the village green in the west.

Illustrative Masterplan

01 Signature Village Green

02 Village Square

03 Attenuation as Gateway Feature

04 New Screening Planting

05 Lower Density Blocks

06 East Court Lane Access

07 Traditional Kentish Avenue

08 Allotments

09 Conservation Area Buffer

10 Playing Fields

11 Flood Risk Zone 2 Area

12 Possible Primary School site

title Illustrative Masterplan

project Lower Rainham

client

job no

drawing no

revision June 18

date 20.6.18

NTS

*Drawing to be used for illustrative purposes only. Subject to further detailed and technical studies including (but not exhaustively):

- Heritage Assessment
- Utilities Survey
- Arboricultural Survey
- Ecological Surveys
- Land Registry Search
- Highway & Transport Studies
- Flood Risk Assessment

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A new Kentish village at Lower Rainham - Key Features

- Fully integrated into the village, where key routes could provide highly sustainable access to both Gillingham and Rainham railway station for pedestrians and cyclists
- Exploration of opportunities to cross the railway
- Potential off-site improvements around the area
- A high quality development which aims to reflect traditional local building styles
- New homes laid out in coherent groupings which reflects the character of local villages
- Sporting facilities for existing and new residents
- A masterplan design which features a network of linear green routes permeating the scheme on the alignment of the streams, hedgerows, tree belts and woodland groups
- The opportunity to provide a sustainable and productive place where orchards and allotments could be used to characterise the environment
- Distinctive street scenes running through the scheme characterised by a succession of evolving vistas
- Access to the Riverside Park

A walkable new village

Pedestrian focused routes will be car free and therefore enjoyable environments

Open spaces will permeate through the scheme to ensure that there is a network of green spaces and routes between one side of the scheme to the other

Land at Lower Rainham

Catesby Estates plc

REPRESENTATIONS TO MEDWAY COUNCIL LOCAL PLAN 2012 – 2035

Development Strategy Consultation Document

Submitted on Behalf Of
Redrow Homes (South East) & Esquire Developments Ltd

June 2018

BARTON WILLMORE
PLANNING / DESIGN / DELIVERY

REPRESENTATIONS TO MEDWAY COUNCIL
LOCAL PLAN
2012 – 2035

DEVELOPMENT STRATEGY
CONSULTATION DOCUMENT

SUBMITTED ON BEHALF OF
REDROW HOMES (SOUTH EAST) & ESQUIRE DEVELOPMENTS LTD

JUNE2018

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Date: 25 June 2018

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APPENDICES

Appendix 1: Site Location Plan

Appendix 2: Site Layout Plan

Appendix 3: SLAA 2015 Extract

1.0 INTRODUCTION

1.1 These representations are submitted on behalf of Esquire Developments Ltd and Redrow Homes (South East) in response to Medway Council's Local Plan 2012 – 2035 Development Strategy Consultation Document (MCDSCD) published in March 2018. As landowners within Medway, Redrow Homes and Esquire Developments have a direct interest in the Local Plan and the long-term development strategy for Medway.

1.2 These representations focus on promoting Redrow Homes and Esquire Developments site known as 'Land to the West of Town Road, Cliffe Woods' (The Site). A Site Location Plan is included at **Appendix 1**.

1.3 Emerging proposals are being prepared for a mixed-use development scheme comprising circa 100 dwellings and 7,300 sqft of employment floorspace including B1 (office) and D1 (nursery school) use (**Appendix 2**).

1.4 The site is located to the west of Town Road, opposite Cliffe Woods Recreational Ground and comprises two parcels of land of approximately 4.04 hectares (10 acres). The site is bisected by a Public Right of Way which crosses the site on an east – west axis, linking Town Road to Buckland Road, to the north west of the site. To the site's northern boundary lies a tree belt with agricultural land located beyond this. The eastern boundary of the site is bordered by the B2000 (Town Road), with residential development located to the southern boundary and further agricultural land to the west. Adjacent to the western boundary of the site lies the site known as 'Land off Town Road, Cliffe Woods' which is currently the subject of a planning appeal. (ref: APP/A2280/W/17/3175461).

1.5 The site is identified as SLAA site reference 1069. It has been assessed in the Medway SLAA 2014, 2015 and 2017. The SLAA 2015 provides for a detailed assessment to the site and concludes (at that time) that the site is unsuitable for development for housing unless identified constraints referred to within the SLAA are addressed **(Appendix 3)**. The SLAA suggests that the site is not considered suitable for development for employment use, whilst the site's suitability for mixed use is considered to be unsuitable unless identified constraints are addressed. This is addressed in section 9 of these representations and it should be noted that both Esquire and Redrow have since acquired the site.

1.6 Notwithstanding our Clients' specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework [NPPF] (March 2012) and

National Planning Practice Guidance [NPPG] (March 2014). Additionally, reference has been made to the Draft Revised NPPF (March 2018) which recently underwent consultation and is expected to come into force Summer 2018.

1.7 The MCDSCD forms the third stage in the Local Plan's preparation (under Regulation 18 of the Local Plan Regulations).

i) Content of Representations

1.8 The MCDSCD and the strategy for the preparation of a new Local Plan, has been assessed on the basis of National policies as set out in Section 2.0. These representations are structured as follows and provide a response to the following matters/questions:

- Section 2.0 – National Planning Policy;
- Section 3.0 – Development Strategy;
- Section 4.0 – Housing;
- Section 5.0 – Employment;
- Section 6.0 – Rural Economy;
- Section 7.0 – Natural Environment & Green Belt;
- Section 8.0 – Built Environment;
- Section 9.0 – Site Suitability;
- Section 10.0 – Conclusions.

1.9 In summary, these representations set out the following comments:

- We recognise scenario 3 of the MC LP moves towards a figure based around meeting the Government's proposed Standardised Methodology for calculating housing need;
- However, at present, Option 3 would not meet the Government's Standard Method figure for Medway of 37,143 homes and would likely be unsound;
- We recommend that MC adopt the full Standard figure and address this matter going forwards;
- We consider Cliffe Woods is a suitable location to accommodate growth and that a high quality, well-designed mixed-use scheme can be delivered on the Site integrating the key principles of sustainable development;
- The Site is considered to be 'suitable', 'achievable' and available'.

2.0 NATIONAL PLANNING POLICY

i) National Policy & Plan Making

2.1 The NPPF (March 2012) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF. These include:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
  (Para. 8)

2.2 The presumption in favour of sustainable development, as set out in the NPPF should be seen as a golden thread, running through both plan-making and decision-taking. For plan-making this means that:

- Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area;

- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted.
  (Para. 14).

2.3 LPAs should 'submit a plan for examination which it considers is "sound" – namely that is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and,
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

(Para. 182).

2.4 The NPPF considers that Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified. (Para. 157).

2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. (Para. 158).

ii) National Policy & Housing Need

2.6 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, 'Objectively Assessed Needs' (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.

2.7 LPAs should plan for a housing mix which takes into account "housing demand and the scale of housing supply necessary to meet this demand." Household and population projections should also be a key consideration, taking into account of migration and demographic change. (Para. 159).

2.8 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

> **Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.**
> (Reference ID: 2a-015-20140306)

2.9 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

> **The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.**
> (Reference ID: 2a-015-20140306)

iii) Duty to Co-operate

2.10 The 'Duty to Co-operate' between LPAs is a clear requirement of National planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to 'strategic priorities' as set out in para. 156. (Para. 178).

2.11 In addition, para. 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged. (Para. 180). LPAs are required to demonstrate how they have met the requirements of the 'Duty to Co-operate during the plan-making process. (Para. 181).

iv) Fixing our Broken Housing Market (February 2017)

2.12 The recent Housing White Paper 'Fixing our broken housing market' (February 2017) reaffirms the Government's commitment to significantly increase levels of housing delivery to meet widely recognised acute housing shortfall.

2.13 Paragraph 1.29 states that plans should put in place policies to allow a good mix of sites to come forward for development to support small and medium sized sites, and thriving rural communities. Ensuring there is choice for consumers and that places can grow in ways that are sustainable.

2.14 Furthermore, paragraph 1.33 confirms the Government are seeking to amend the NPPF to expect local planning authorities to identify opportunities for villages to thrive. This has been carried through to the Draft Revised NPPF (March 2018), Rural Housing section.

v) Draft Revised NPPF (March 2018)

2.15 The Draft Revised NPPF was published for consultation in March 2018 and incorporates policy proposals previously consulted on in the Housing White Paper. The consultation closed on 10 May 2018. Whilst the revised NPPF is still in draft, it is anticipated[1] that the Medway Local Plan will be examined against the policy requirements of the new NPPF. It is thereby essential that MC has regard to the emerging NPPF policy requirements as it prepares the Regulation 19 Draft Plan.

[1] Para. 209 of the Draft NPPF states that *"policies in the previous framework will apply for the purposes of examining plans, where those plans are submitted on or before [six months after the date of publication]"*. The Government has indicated that it is aiming to publish the Final Revised NPPF in Summer 2018. Thereby this is very likely to be fully in force for the anticipated submission of the Medway Local Plan in March 2019.

2.16 The Draft Revised NPPF maintains a focus on the presumption in favour of sustainable development for plan-making and decision taking. Plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. Furthermore, strategic plans should, as a minimum, provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas, unless policies within the Framework that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development in the Plan area; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken a whole.

2.17 The Draft Revised NPPF retains its emphasis on significantly boosting the supply of homes, indicating that planning policies and decisions should help a sufficient amount and variety of land to come forward where it is needed and that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. (Para. 60). Furthermore, continued focus is placed on 'Building a strong, competitive economy' indicating that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local and business needs and wider opportunities for development (Paragraph 82).

2.18 In respect of Neighbourhood Plans, NPs should support the delivery of strategic policies contained within Local Plans and should shape and direct development that is outside of these strategic policies. (Para. 13).

2.19 Where a NP that has recently been brought into force contains policies and allocations to meet its identified housing requirement, the adverse impact of allowing development that conflicts with it is likely to significantly and demonstrably outweigh the benefits where: para. 75 of the Framework applies (see below); and the LPA has at least a three-year supply of deliverable housing sites (against its five-year housing supply requirement), and its housing delivery was at least 45% of that required over the previous three years. (Para. 14).

2.20 Para. 75 notes that for applications which include housing, paragraph 11d of the Framework will apply if the LPA cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer), or where the Housing Delivery Test indicates that delivery of housing has been substantially (below 75% of the housing requirement) below the housing requirement over the previous three years.

2.21 Para. 66 indicates that Strategic Plans should set out a housing requirement figure for designated Neighbourhood Areas. The figure should take into account factors such as latest evidence of local housing need, the population of the Neighbourhood Area and the most recently available planning strategy of the Local Planning Authority. (Para. 67).

2.22 Local Planning Authorities are requested to promote working with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes. (Para. 69).

2.23 Para. 79 sets out that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Furthermore, to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Additionally, Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. (Para. 80).

2.24 Planning policies and decisions should continue to enable the sustainable growth and expansion of all types of businesses in rural areas both through the conversion of existing buildings and well designed new buildings. (Para. 83).

2.25 Notably, planning policies and decisions should recognise that sites to meet local businesses and community needs in rural areas may have to be found outside of existing settlements, and in locations that are not well served by public transport. In such cases, it is important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities for making a location more sustainable. The use of sites that are well-related to existing settlements should be encouraged where suitable opportunities exist. (Para. 84).

2.26 A new chapter, 'Making effective use of land' encourages planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

2.27 Furthermore, in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method included within the draft Planning Practice Guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In establishing this figure, any needs that cannot be met within neighbouring areas should also be taken into account. (Para. 61)

2.28 As detailed above and in respect of the Site, the draft revised NPPF is likely to introduce some policy changes which will have significant implications for the ongoing preparation of the Medway Local Plan.

vi) Draft Planning Practice Guidance (March 2018)

2.29 Alongside the draft revised NPPF, the Ministry of Housing Communities and Local Government (MHC&LG) is undertook a consultation on draft updates to planning practice guidance which will form part of the Government's online Planning Practice Guidance.

2.30 The draft NPPG includes changes to Housing Delivery. The draft NPPF and Guidance requires Local Planning Authorities to have an identified five-year housing land supply at all points during the Plan period. The draft NPPG suggests the monitoring of a five-year land supply through an annual position statement. Moreover, LPA's should demonstrate that a five-year supply of deliverable housing sites, with the appropriate buffer, can be shown where it has been established in a recently adopted plan, or in a subsequent annual position statement. The starting point for calculating the five-year land supply should be housing requirement figures in local and strategic plans. However, where the plan is more than five years old and the housing figure needs revising, the starting point will be local housing need using the standard method.

2.31 The draft NPPG also sets out how the standard method for assessing Objectively Assessed Housing Need will be calculated.

3.0 DEV ELOPMENT STRATEGY

Question DS1: Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?
What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

3.1 Section 3 of the MCDSCD sets out four development scenarios for consultation based on different growth targets and associated spatial distribution of housing land with common approaches to employment and retail land within the strategy. This can be broadly summarised as identified within the table below:

Scenario		Locational Strategy	Estimated Capacity (Units)
1	Meeting Objectively Assessed Need	• Strategy based on firstly directing growth to brownfield sites, proposed development of rural town at Hoo and some suburban expansion; • Based on North Kent Strategic Housing and Economic Needs Assessment (2015) OAN figure of 29,463 homes over the Plan period.	29,950
2	Investment in Infrastructure to unlock growth	• Development at a faster pace on Hoo Peninsula supported by passenger rail service, upgrade capacity of highway networks.	31,033
3	Meeting government's proposed calculation of Local Housing Need	• Development on Hoo Peninsula; • Land in the Capstone Valley and north and east of Rainham would be considered as potential allocations for development; • development of the urban opportunity areas and achieving high densities on sites;	35,961

Scenario		Locational Strategy	Estimated Capacity (Units)
		• Based on government's proposed standardised methodology which calculates a need for 37,143 homes over the Plan period. However this scenario still leaves a shortfall of 1,182 homes when compared against the Standard Method figure of 37,143 homes.	
4	Consideration of development within Lodge Hill SSSI	• Incorporates emerging proposals by Homes England for a revised scheme at Lodge Hill for up to 2000 homes as part of a wider strategic development of the wider Hoo rural town.	30,569

3.2 We recognise that scenario 3 seeks to deliver the highest quantum of growth from the above scenarios. However, it still falls short of meeting the Government's proposed Standardised Methodology for calculating housing need. The Draft Revised NPPF is clear that LPAs should meet their housing needs in full, and therefore MC needs to provide for the full Standard Method figure for Medway of 37,143 homes. **We recommend that MC seek to address this matter going forwards.**

3.3 Policy DS2: Spatial Development Strategy directs that the Council will consider a lesser scale of development in defined sites in suburban locations and also villages. We object to the reference of only specific locations, as there are more locations within Medway that are deemed sustainable locations. The policy is too prescriptive in this respect. Reference to specific locations should be removed as per below:

> **The council will consider a lesser scale of development in defined sites in suburban locations around Rainham and Capstone and ~~the~~ villages ~~of High Halstow, Lower Stoke, Allhallows, Grain and Halling~~, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.**

3.4 At present, no sites are proposed to be allocated under the 4 development scenarios in Cliffe Woods. We note that other similar locations (in sustainability terms) such as High Halstow do include allocations and it is unclear within the evidence base why Cliffe Woods has been excluded for potential allocations.

3.5 We consider that an appropriate level of growth proportionate to the village is essential to ensure the future vitality of the settlement. Particularly given the level of growth attributed to development of the rural town at Hoo and High Halstow. In the light of the need to meet the OAN figure in full, it is considered that additional allocations are necessary to meet the housing requirement.

4.0 HOUSIN G

Q.H1: Does the proposed policy for housing delivery represent a sound approach? Would you suggest an alternative approach?

4.1 In light of our comments relating to the previous section, we consider than an alternative approach is required to deliver a sound Plan. This includes increasing the housing requirement to meet the recognised Standard Method.

4.2 Whilst we support and welcome the notion that the Plan recognises that unidentified development would be supported that is of a lesser scale in rural areas, the present wording would potentially exclude a location such as Cliffe Woods. The Plan should seek to proactively address how it intends to meet the housing requirement on identified sites where they exist. We consider that a pragmatic approach to development within villages needs to be assessed.

4.3 Notwithstanding, it is recognised that growth is needed in villages to promote vitality and we support that the Plan recognises the role that villages can play to meet the housing requirement. Additional development in Cliffe Woods would help to maintain and enhance the vitality of existing services and facilities located in the village

i) Calculating Objectively Assessed Housing Need

4.4 As noted in Section 2 above, a key change emerging from the Draft NPPF is the requirement use the Government's 'standard methodology' to calculate OAN.

4.5 The standard method OAN figure for Medway is 37,143 over the Plan period, which equates to 1,665 dwellings per annum. Whilst it is recognised this is a large uplift, it is considered that this target is achievable and that sites are available to meet this target. It would be a critical failure of the plan if it did not, as a starting point, seek to determine how it could meet this figure. The plan does not presently undertake this exercise and therefore the plan is unsound in this respect. To not seek to meet this target would be a fundamental failure of the Council to proactively tackle meeting its own housing needs and indeed play its part in meeting the wider housing crisis.

4.6 It is disappointing that the MCDSCD has not endorsed the full standard methodology OAN figure for Medway when both the Housing White paper and draft revised NPPF both direct LPAs to meet the standardised housing target in full.

4.7 MC must fully accept the standard method figure as a starting point and should seek to meet this requirement, as is consistent with achieving sustainable development. MC should not seek to promote and justify an alternative OAN.

4.8 Paragraph 61 of the draft NPPF is clear that the standard methodology should be used unless there are 'exceptional circumstance' that justify an alternative approach. Whilst these 'exceptional circumstances' are not defined in the draft NPPF, with its echoes of well-established Green Belt policy, it is clear that this is a very high bar.

4.9 Whilst the MCDSCD appears to indicate that an alternative OAN figure may be preferred going forward (namely the 2015 SHMA figure), the consultation document fails to set out the necessary 'exceptional circumstances' which would be required to justify the alternative approach. We consider that in the absence of a robust exceptional circumstances justification the Local Plan is unsound.

4.10 It is however noted that the consultation document states at paragraph 3.9 that:

> **"It is recognised that areas may have important constraints, such as environmental designations, Green Belt, or physical constraints that restrict the ability to meet the needs in full. If this is robustly and soundly assessed, the plan may promote a housing target lower than the Local Housing Need figure. However, the council will be required to explore other options for meeting its area's housing needs, such as providing more land in a neighbouring borough."**

4.11 We note that this is <u>not</u> an exceptional circumstances justification for alternative OAN methodology. Rather this is an explanation for why the OAN cannot be met. This thereby relates to the Local Plan 'strategy' and the tests of Soundness (Para. 36) and the Presumption in Favour of Sustainable Development (Para. 11), rather than OAN methodology.

4.12 We consider that the Council must accept the standard method figure and work back from this to assess if this can be accommodated in accordance with the Presumption (Para. 11b). Whilst there may be evidence that the full standard method OAN cannot be accommodated without the *"adverse impacts of doing so significantly and demonstrably outweighing the benefits"*, this must be clearly set out through the SLAA and SA.

4.13 In summary, it would be inappropriate for the Council to seek to use an alternative approach to calculate OAN, because of an assumption that the Borough is constrained.

ii) Identifying Land for Homes

4.14 We consider that the development strategy for Medway also needs to consider bringing forward development on small sites in rural locations in line with the proposals set out in the draft revised NPPF. This recognises the importance of small sites in contributing to meeting the housing requirement of an area. To promote the development of a good mix of sites, LPA's (amongst other matters) should work with developers to encourage the sub-division of large sites where this could speed up the delivery of homes. (Para. 69). The Site is considered to be a good example of where an SME (Esquire Developments) has partnered up with a volume housebuilder (Redrow Homes) to bring together cohesive development proposals which could allow the efficient delivery of a mixed-use development.

Q.H2: Does the proposed policy for housing mix represent a sound approach? Would you suggest an alternative approach?

4.15 We agree with the approach taken on housing mix and the principle that the mix should be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood. Policies on housing mix should allow sufficient flexibility to ensure that policy requirements are not particularly onerous and make developments unviable – especially in respect of small and medium sized sites.

4.16 We are concerned that Draft Policy H2 states that large development schemes meeting the criteria set out at draft Policy H9: Self-build and Custom Housebuilding, must demonstrate that sufficient consideration has been given to custom and self-build plots as part of the housing mix. There are challenges that need to be recognised with the inclusion of self-build plots on large sites. These challenges include the design of self-build plots could be out of character with the rest of the development; the build programme for such units would likely be more protracted; and the inclusion of self-build plots could present health and safety issues with other uncontrolled parties on large sites.

Q.H3: Do you agree with the threshold for contributions for affordable housing and the pe rcentage r equirements for its p rovision? What do you c onsider woul d represent an effective alternative approach?

4.17 The SHMA (November 2015) (para 6.53) identifies that the affordable housing 'need' is greater than the identified affordable housing 'supply' over the projection period (2012 – 2037), the Local Plan period (2012 – 2035) and on an annual basis. The SHMA calculated a need for 18,592 affordable dwellings (744dpa), which would constitute 58% of MC's identified OAN figure of 1,281dpa. The PPG advises that an increase in the total Local Plan housing figure

should be considered where it could help to deliver the required amount of affordable housing (Reference ID: 2a-029-20140306).

4.18 The need for affordable housing nevertheless, should be balanced against development viability considerations. The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."* (Para. 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing when taking account of the normal cost of development and mitigation, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

4.19 We acknowledge that the draft revised NPPF takes a different approach to viability, considering that this should be assessed at the Plan making stage and the use of viability assessment at the decision-making stage should not be necessary. Furthermore, there are changes to the guidance on the methodology for assessing viability. Further guidance is required as to how this will work in practice.

4.20 We would consider that considering the highlighted need for affordable housing provision as identified in the North Kent SHMA (November 2015), seeking the provision of up to 25% affordable housing is appropriate although, further viability evidence, in line with the draft revised NPPF is required to robustly assess the proportion of affordable housing provision for both rural and urban areas, given the Plan-led approach to viability.

Question H4: What do you consider would represent an effective split of tenures between affordable rent and intermediate in delivering affordable housing?

4.21 We consider that MC should develop policies related to affordable housing with reference to the draft revised NPPF, with flexibility to take into account the changes to the definition of affordable housing including the merging of social rented housing and affordable rented housing into one definition of affordable housing for rent, also encompassing Build to Rent schemes.

5.0 EMPLO YMENT

Question E1: Do you consider that this is an effective approach to securing and strengthening Medway's economy?

5.1 We broadly support the MC's Economic Development strategy to boost Medway's economic performance.

Question E3: Do you agree with the proposed approach to assessin g GVA with planning applications for employment uses?

5.2 We do not consider that all planning applications for employment uses should be assessed for their GVA contributions as assessments should be relative to the scale of development proposals coming forward. For example, it may be particularly onerous for development schemes for smaller scale employment uses as part of mixed use development to be required to undertake this level of assessment. We do however support employment uses being assessed based on whether the proposed use is best aligned to the site characteristics and locational offer.

Question E5: Do you cons ider tha t the re is demand fo r fu rther s erviced office accommodation in Medway?

5.3 We consider that there is interest in B1 use to serve a local offer for small-scale business. Specifically, with the emerging development proposals for Land to the west of Town Road, Cliffe Woods, an identified need for locally based office space for nearby business has become apparent and MC should similarly seek to support provision for locally based office space for small-scale businesses within villages to contribute towards sustainable growth and the continuing vitality of villages.

6.0 RURAL ECONOMY

Question E6: Do you agree with the proposed policy approach for the rural economy? What alternative approaches would you propose?

6.1 We generally agree with MC's proposals to define countryside areas outside of the urban and village settlement boundaries, where the land based economy will be supported providing that it does not conflict with requirements to conserve and enhance the environment. However, such definition of countryside areas should not restrict development proposals for alternative land uses, including residential, where it is demonstrated to be sustainable.

6.2 We consider that support should also be provided for new services and facilities located outside of the urban and village settlement boundaries which serve to enhance the vitality of villages, insofar as they are sustainably located. Such developments serve to provide a valuable contribution to the rural economy. The draft revised NPPF supports this principle, maintaining that plans should identify opportunities for villages to grow and thrive, especially where this will support local services. (Para. 80). Furthermore, planning policies and decisions should enable the sustainable growth and expansion of all types of businesses in rural areas, including through the development of well designed new buildings; and the development of accessible local services and community facilities. (Para. 84).

6.3 We support the Council's aspirations to support the growth of rural businesses in well-designed development in appropriate locations that respect the character of the countryside and environmental features. In respect of the Site, the emerging development proposals demonstrate how a mixed-use scheme comprising residential, office and educational uses can come together to provide a high quality development which integrates into the landscape and promotes the principles of sustainable growth. **The delivery of such schemes would be greatly enhanced through the identification as an allocation in any subsequent Local Plan.**

6.4 The draft revised NPPF acknowledges that developments that serve local business and community needs in rural areas may have to be found outside of existing settlements. In such instances, development should be sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport. Sites which are well-related to existing settlements should be encouraged where suitable opportunities exist. (Para. 85). The Site is considered to be relatively well related to existing development to the south of the Site and adjacent to the east, forming a logical expansion to

the village core. The emerging development proposals for the Site include improvements to the footway along Town Road within the vicinity of the Site and a pedestrian crossing to aid accessibility to the east of the Site.

6.5 Furthermore, we are encouraged by the Council's aspirations to seek the retention of key rural services and facilities to promote sustainable villages, providing for the needs of rural residents. MC should also seek to promote the provision of new services and facilities, where there is a demonstrated need, to serve rural residents and further promote and enhance the ongoing vitality of villages. In the case of the Site, an identified need for B1 use has become apparent as well as interest from a pre-school provider with the potential for a Special Education Needs (SEN) unit (D1 use) to serve the local community.

7.0 NATURAL ENVIRONMENT AND GREEN BELT

Question NE2: Do you consider that this is an effective approach to conserving and enhancing Medway's natural environment? What alternative approaches would you recommend to secure the favourable condition of these areas?

7.1 We support the Council's aspiration to promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas, and pursuing opportunities to strengthen biodiversity networks. The emerging development proposals at the Site include opportunities to maintain and enhance biodiversity on-site. Presently the majority of the Site is considered to be of low ecological value. From initial ecological survey work, the Site appears to support a range of habitats suitable for a number of protected faunal species. As such, further survey work is being undertaken to confirm potential for species and establish presence/absence. It is considered that biodiversity enhancements can be achieved through the retention of key faunal habitats within a sensitively designed masterplan and appropriate safeguarding measures.

Question NE4: Do you consider that this is an effective approach to landscape policy in Medway? What alternative approaches would you recommend?

7.2 We support the notion that new development should provide for green infrastructure that supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation and seeks opportunities to strengthen the resilience of the natural environment. The emerging development proposals for the Site provides an overarching landscape strategy, opportunities for improved connectivity and enhancement to biodiversity which strongly support the principles of the draft LP policy.

8.0 BUILT ENVIRONMENT

Question BE1: Does the proposed policy for high quality design represent the most appropriate approach for the Medway Local Plan?
What do you consider would represent a sound alternative approach towards planning for high quality design in the Medway Local Plan?

8.1 We support the key principles and criteria outlined within draft Policy BE1 which generally align with the NPPF and draft revised NPPF. The emerging development proposals at the Site provide a high quality, well designed mixed use development.

Question BE2: Does the proposed policy for sustainable design represent the most appropriate approach for the Medway Local Plan?
What do you consider would represent a sound alternative approach towards sustainable design in the Medway Local Plan?

8.2 We consider that more detail is required to expand Policy BE2: Sustainable Design. The policy also makes no reference to targets for non-residential development.

Question BE3: Does the proposed policy for housing design represent the most appropriate approach for the Medway Local Plan?
What do you consider would represent a sound alternative approach for housing design in the Medway Local Plan?

8.3 Policy BE3: Housing Design requires all new accommodation, in addition to the general design policy to, as a minimum meet the relevant nationally described internal space standard for each individual unit; and as a minimum meet the Medway Housing Design Standard for external spaces. We consider that MC should ensure that it has sufficient evidence in relation to the need and viability of additional standards in line with the NPPG (Paragraph: 002 Reference ID: 56-002-2016051. Furthermore, we consider that there should be additional wording within the policy for flexibility to differ from these standards should specific site constraints identify that it would be difficult to achieve a high quality, well designed scheme with the imposed standards.

9.0 SITE SUITABILITY

9.1 We consider that the Site is suitable for mixed use development and have undertaken an assessment of site suitability, reviewing the conclusions from the SLAA 2015 site specific assessment (**Appendix 3**). This is set out in table 9.1 below.

9.2 It should be noted that since the SLAA assessed the site, Esquire Developments and Redrow Homes have acquired the site and undertaken a significant amount of technical surveys and engagement with the Parish Council. As a result, the opportunities and constraints on the site are well known.

Table 9.1 - Site Suitability Review

Suitability - General	MC Comment	BW Comment
Facilities & Services Accessibility	Site has poor access to services and facilities.	Disagree. Cliffe Woods has sufficient services and facilities to support the level of development proposed. This includes a convenience store with Post Office, Community Centre, primary school and pre-school and a doctor's surgery. Furthermore, the development proposals include B1 use – office space for local businesses and D1 use with the location of a nursery school with specialist SEN facility on site complementing the existing services.
Public Transport Accessibility	Site has poor access to public transport opportunities.	Disagree. Higham railway station is located 2.7km west of the site. There are bus stops located at View Road, approximately 579m to the south east of the site, providing services to Cliffe, Strood, Frindsbury, Rochester, Chatham, Grain, Allhallows, Gillingham, Gravesend, Higham and Shorne.

Suitability - General	MC Comment	BW Comment
Highway Network Capacity	Access to the strategic highway network (M2/A2) is via the Four Elms Roundabout and A289. Currently some capacity issues experienced at this junction, upgrades are planned and are expected to so someway towards resolving these constraints. Detailed assessment of the implications of the development for the Four Elms Roundabout is likely to inform the LP and development management process. Assessment of M2 Junction 1 may also be required. Further detailed assessments as part of LP or development management process to demonstrate how traffic generated by the development could be accommodated on the highway network.	The scale of development would not lead to a detrimental impact on the local or wider strategic road network. Access can be satisfactorily achieved and highway upgraders (such as pedestrian crossings) are being actively explored through modelling and a wider Transport Assessment.

Suitability - General	MC Comment	BW Comment
	Developer contributions may be required to fund infrastructure upgrades necessary to address capacity constraints.	
Site Access	Likely a suitable vehicular access could be created on to Town Road. The suitability of the prospective access would need to be further investigated through the Development Management Process.	Agree. An appropriate site access has been proposed and will be supported by further assessment to ensure safe access.
Ecological Potential	An ecological survey of the site has not been investigated as part of the high-level assessment and as such the presence or absence of protected species and/or habitats cannot be established at this stage. Further assessment would therefore need to be undertaken through the LP or development management process before development	A full Phase 1 Ecological Survey has been undertaken of the site. Phase 2 surveys are being carried out in the 2018 ecological window. There is limited habitat for protected specific within the site. Boundary vegetation and off site ponds are being further explored but do not pose an overriding constraint to the development of the site.

Suitability - General	MC Comment	BW Comment
	could be supported or rejected.	
Designated Habitats	Natural England guidance (Impact Risk Zones) indicates that development of this site poses a potential risk to a SSSI. Further assessment of the potential impacts of development upon designated habitats would therefore need to be undertaken through the LP or development management process before development could be supported or rejected.	Further assessment is being undertaken in connection with the Ecological survey work to fully address Natural England guidance.
Landscape	The site is situated outside of the built up area, within an area of locally valued landscape – Cliffe Woods Farmland – which is considered sensitive to changes. Development is thereby likely to have a detrimental impact upon locally valued local landscapes.	Disagree. It is acknowledged the site lies outside the built up area, however, the site is considered to be able to accommodate change and a sensitively designed scheme can come forward, with sufficient landscape mitigation measures.

Suitability - General	MC Comment	BW Comment
Heritage	Development is unlikely to have an impact upon any designated heritage assets.	Agree. Not located within any Conservation Areas and there are no Listed Buildings in close proximity to the site. An Archaeological Desk Based Assessment has been undertaken which concludes that the Site has some archaeological potential and it is likely that further exploratory work will be required as part of a planning condition on any future planning consent but this would not preclude development.
Air Quality	Site may be constrained by air pollution but mitigation is likely to be deliverable.	Disagree. MC EHO has confirmed that an Air Quality Assessment is not required to be submitted as part of any subsequent planning application and an Emission Mitigation Assessment and standard mitigation measures can be conditioned.
Contamination	Contamination is not suspected on the site.	Agree. A Preliminary Risk Assessment is being undertaken to provide confirmation of this matter.
Site Developability	A major pipeline runs through or near to the site which may constrain development.	Agree. A mains gas pipe is located within the site. This constrains development only insofar that appropriate easements are necessary to be provided. This has been taken into consideration and it does not affect the developability of the site. The site layout has been carefully designed to avoid the pipeline and any safeguarding areas required.
Agricultural Land	The site is situated on the best and most	The Site comprises a mosaic of long sward grassland, ruderal and scrub

Suitability - General	MC Comment	BW Comment
	versatile agricultural land.	vegetation and young scattered trees with these habitats largely having been established since 1999, with the Site previously comprising a grassland field with no trees or other vegetation present. The Site has not been used for agricultural purposes for the last 20 years or so.
Open Space	Site is not designated open space.	Agree.

Suitability - Housing	MC Comment	BW Comment
Flood Risk	Site is at low risk of flooding.	Agree. The Site is located within Flood Zone 1 with a low probability of river or sea flooding.
Amenity/Overlooking	The site has the potential to impact upon amenity of nearby residential properties. Whilst this is likely to be resolvable through sensitive design, it is likely this would have implications for site capacity.	Disagree. The site layout and design has been carefully considered to avoid impact on neighbouring residential amenity.
Employment Land	Site is not designated employment land.	Agree.
Overall	The site is considered unsuitable for development unless identified constraints can be addressed.	Disagree. The supporting technical assessments for the planning application show how sustainable development can come forward on this Site with appropriate enhancement and mitigation measures.

Suitability – Economic Development	MC Comment	BW Comment
Flood Risk	Site is at low risk of flooding.	Agree. see comments above.
Noise	Commercial uses on the site are unlikely to be constrained by noise pollution.	Agree. MC EHO has confirmed that a Noise Impact Assessment is not required to be submitted as part of any planning application and any potential assessment could be secured by planning condition.
Amenity	Mainly residential with few commercial uses.	Agree. Not considered to have a detrimental impact upon residential amenity.
Overall	Site is unsuitable for employment uses.	Disagree. We consider that certain employment uses are suitable for the Site including B1 (office) that complement and offer the village a significant benefit of employment opportunity.

Suitability – Mixed Use	MC Comment	BW Comment
Overall	The site is considered unsuitable for development unless identified constraints can be addressed.	Disagree. We consider that the Site is suitable for mixed use development.

	MC Comment	BW Comment
Availability	Landowner is actively promoting the site for redevelopment through call for sites – housing.	A planning application for mixed use development is being prepared on behalf of Redrow Homes and Esquire Developments.

9.3 In summary, the Site is considered to be suitable to support the sustainable growth of Cliffe Woods and it has demonstrated that with further technical evidence, identified constraints can be positively addressed to provide a high quality, well-designed scheme.

10.0 CO NCLUSIONS

10.1 These representations are submitted on behalf of Esquire Developments Ltd and Redrow Homes who have a direct interest in the Local Plan and the long-term development strategy for Medway.

10.2 These representations focus on promoting the site controlled by Esquire Developments and Redrow Homes' known as 'Land to the West of Town Road, Cliffe Woods'.

10.3 The Medway Integrated Growth Needs Assessment (November 2015) identifies that while there is a need to reinvigorate town centres and deliver sustainable development in locations that maximise existing infrastructure, the results of the Housing Needs Survey have indicated a desire for access to housing in rural areas. Furthermore, rural areas should be allowed to grow and diversify, through the provision of a range of property types, including some smaller units, helping to underpin their wider offer.

10.4 We recognise that scenario 3 seeks the greatest level of growth but it is likely to be considered unsound as it does not meet the Government's proposed Standardised Methodology for calculating housing need in full. We **recommend** that MC seek to address this matter going forwards.

10.5 We **recommended** amendments are made to Policy DS2: Spatial Development Strategy. This is on the basis that the current wording is inflexible and is not positively prepared or effective.

10.6 Any strategy for growth will need to have consideration to the desire for an increased access to housing in rural areas, which should be allowed to grow and diversify.

10.7 Presently we consider that the Plan is likely to be found unsound as set out within the NPPF, for the following reasons:

- Positively prepared & Justified– The MCDSCD does not seek to meet the full OAN set out within the Government's Standard Method figure for Medway of 37,143 homes in any development scenario. MC should be seeking to meet the standard method figure as a starting point.

- Effective – In order to meet the Government's Standard Method OAN, the Plan should ensure that enough housing sites are allocated to achieve a Plan that is deliverable.

- Consistent with national policy – It is very likely that the Plan will be examined under the new planning regime being drought forward through the draft revised NPPF which is expected to come into force during Summer 2018. It is critical that the next iteration of the Plan takes into account changes to the NPPF and is aligned with its policy direction.

i) Sustainable Development

10.8 The development would meet the three elements of sustainable development, as set out in the NPPF (para 7). Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase. The Site has deliverable potential to contribute towards much needed housing within rural Medway and would deliver a mix of housing types, including 25% affordable housing.

10.9 The Site meets the NPPF's three dimensions of Sustainable Development and performs:

- *a social role*: by delivering housing that is if a suitable mix and quality including affordable to meet the need;
- *an economic role*: in bringing forward employment opportunities during the construction phases, increased in labour force to the area, additional expenditure to the local economy by future residents and New Homes Bonus; and
- *an environmental role*: in being well located to existing facilities and services as well as public transport routes. It will also provide for new areas of public open space and enhance biodiversity.

10.10 Furthermore, the development would help to enhance and maintain the vitality of the rural community of Cliffe Woods, in line with Paragraph 55 of the NPPF.

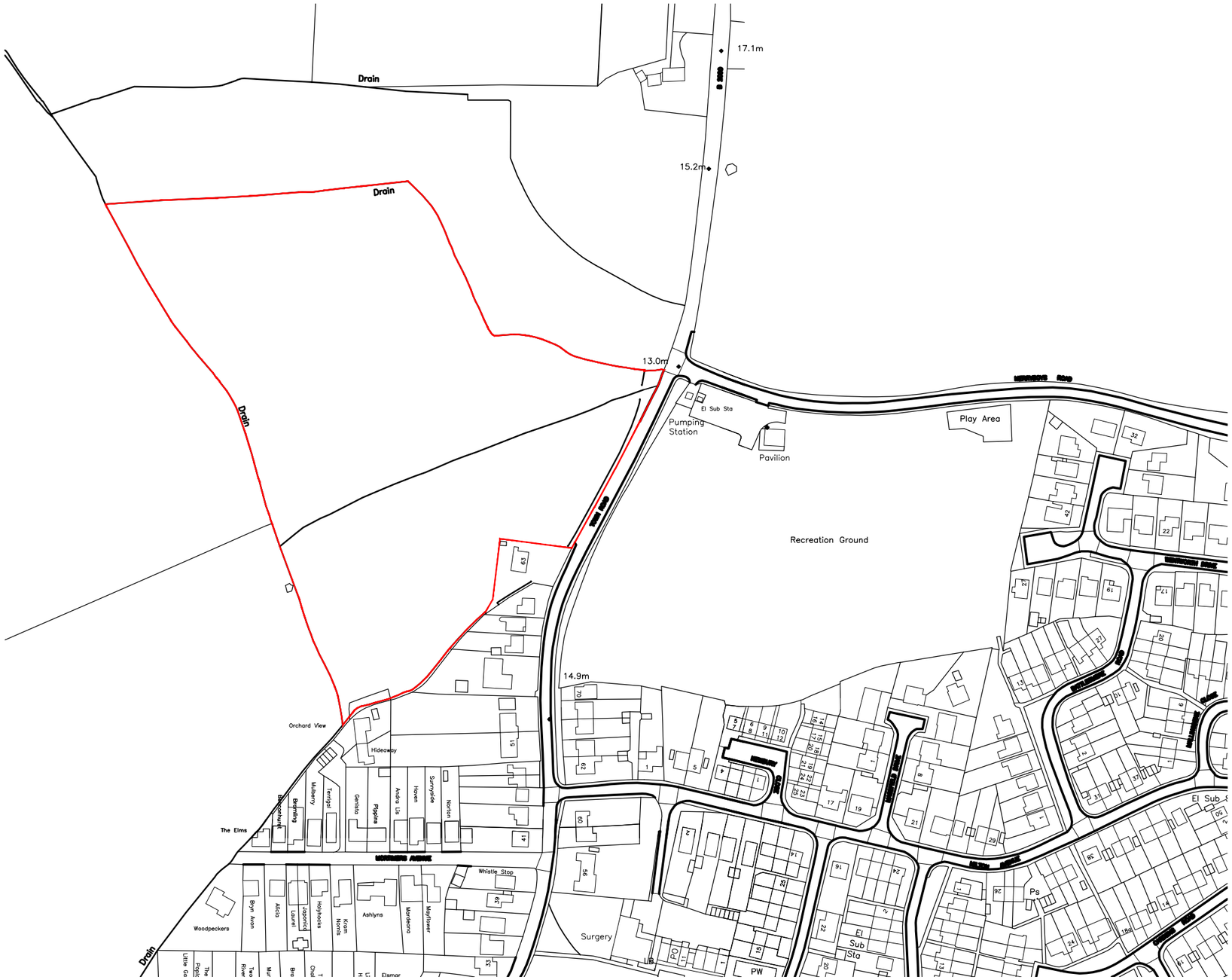
10.11 The Site is being promoted for mixed use development and a planning application is currently being prepared and will be submitted to MC within the coming months. It is therefore 'available' for development. The technical assessments which will support the application will demonstrate that the development proposals are 'suitable'.

10.12 The Site can be delivered in the first 5 years of the plan period and there are no overriding technical constraints to delivery. It is therefore 'achievable'.

APPENDIX 1

Site Location Plan

Esquire Developments Ltd



Proposed Mixed Use Development, Land North of Town Road, Cliffe Woods, Rochester

NOTES:

Do Not Scale.

Report all discrepancies, errors and omissions.

Verify all dimensions on site before commencing any work on site or preparing shop drawings.

All materials, components and workmanship are to comply with the relevant British Standards, Codes of Practice, and appropriate manufacturers recommendations that from time to time shall apply

For all specialist work, see relevant drawings.

This drawing and design are copyright of Clague LLP
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Rev	Date	Description

Project Title

Proposed Mixed Use Development
Land North of Town Road,
Cliffe Woods,
Rochester,
Kent
For: Esquire Developments Ltd

Drawing Description

Site Location Plan

Scale	Drawn by
1:2500 @A3	KF
Date	Checked by
November 2017	KE

CLAGUE ARCHITECTS

62 Burgate, Canterbury
Kent CT1 2BH
01227 7620

1 Kinsbourne Court, Luton Road,
Harpenden, Hertfordshire Al5 3BL
01582 7651

8, Disney Street
London SE1 1JF
0203 597 611

CANTERBURY LONDON HARPENDE

Drawing Number	Revision
23486A/01	P2

APPENDIX 2

Site Layout Plan

A0

Appraisal Layout-Option C

Town Road, Cliffe Woods, Rochester

This drawing illustrates a sketch proposal only and as such is subject to detailes site investigation including ground conditions/contaminants,drainage,design and planning/density negotiations.The layout may be based upon an elargement of an o.s. sheet or other small scale plans and its accuracy will need to be verified by survey. Full risk assessment under CDM Regulations has not been undertaken.

nb.no account has been taken of any services laid on or around the boundaries of the site.

nb.this layout takes no account of any trees on or around the boundaries of the site.

The Contractor is to check and verify all building and site dimensions, levels and sewer invert levels at connection points before work starts. The Contractor is to comply in all respects with current Building Legislation, British Standard Specifications , Building Regulations, Construction (Design & Management) Regulations, Party Wall Act, etc. whether or not specifically stated on this drawing. This drawing must be read with and checked against any structural, geotechnical or other specialist documentation provided. This drawing is not intended to show details of foundations, ground conditions or ground contaminants. Each area of ground relied upon to support any structure depicted (including drainage) must be investigated by the Contractor. A suitable method of foundation should be provided allowing for existing ground conditions. Any suspect or fluid ground, contaminates on or within the ground, should be further investigated by a suitable expert. Any earthwork constructions shown indicate typical slopes for guidance only & should be further investigated by a suitable expert.
Where existing trees are to be retained they should be subject to a full Arboricultural inspection for safety. All trees are to be planted so as to ensure they are a minimum of 5 metres from buildings and 3 metres from drainage and services. A suitable method of foundation is to be provided to accommodate the proposed tree planting.
Geoff Perry Associates Limited do not accept any responsibility for any losses (financial or otherwise) to any Client or third party arising out of the Clients (be it Developer or Contractor but not limited thereto) non-compliance with afore mentioned provisos.
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Revisions:

A. Replanned in accordance with clients mark-up.
GVP 04.05.18

B. Replanned in accordance with clients mark-up.
GVP 09.05.18

C. Numbers increased to 94.
GVP 09.05.18

D. Plot 60 amended.
GVP 09.05.18

E. Commercial area and southern area replanned.
GVP 11.05.18

F. Parking broken up and landscaping altered.
GVP 21.05.18

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Client:
REDROW HOMES SOUTH EAST LTD

Project:
TOWN ROAD, CLIFFE WOODS, ROCHESTER

Title:
APPRAISAL LAYOUT- OPTION C

Date: 22 / 03 / 2018 **Scale:** 1:500 @ A0
Drawn by: GRP **Checked by:** -

Job No.	Drwg No.	Rev.
A637	192	F

Scale Check:

APPENDIX 3

SLAA 2015 Extract

Site	
Reference	1069
Address	North Mortimers Avenue, west of Town Road, Cliffe Woods
Description	Site is overgrown with a grassy footpath running through the centre. A haven for wildlife, the public footpath is probably popular with dog walkers. Not really logical to develop the site on its own, the only use put forward being residential.
Size (ha)	4.33
Relevant policy guidance	
Location Plan	

Development Potential		
Residential (units)	125	
Employment (m^2)	Office	43,250
	Industrial	17,300
	Storage	17,300
Main Town Centre Uses (m^2)		
Other Uses		

Suitability - General		
Facilities & Services Accessibility	Site has poor access to services and facilities.	
Public Transport Accessibility	Site has poor access to public transport opportunities.	
Highway Network Capacity	Access to the strategic highway network (M2/A2) is via the Four Elms Roundabout and A289. Whilst there are currently some capacity issues experienced at this junction, upgrades are planned and are expected to go someway towards resolving these	

Suitability - General		
	constraints. Detailed assessment of the implications of development for the Four Elms Roundabout is likely to be required to inform the local plan and development management process. Assessment of M2 Junction 1 may also be required. Access around the Medway urban distributor network is likely to be constrained by a number of identified congestion hotspots including Medway Tunnel in particular. Whilst it is possible that strategic infrastructure upgrades may address these congestion issues, improving access to the urban distributor network, there are no upgrades planned or identified at present. Further detailed assessment would need to be undertaken (as part of the Local Plan or development management process) to demonstrate how traffic generated be the development could be accommodated on the network. Developer contributions may be required to fund infrastructure upgrades necessary to address capacity constraints.	
Site Access	It is likely a suitable vehicular access could be created on to Town Road, which is directly adjacent to the site. Notwithstanding the above, the suitability of the prospective access would need to be further investigated through the Development Management Process.	
Ecological Potential	An ecological survey of the site has not been investigated as part of this high level assessment and as such the presence or absence of protected species and/or habitats cannot be established at this stage. Further assessment would therefore need	

Suitability - General		
	to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.	
Designated Habitats	Natural England guidance (Impact Risk Zones) indicates that development of this site poses a potential risk to a SSSI. Further assessment of the potential impacts of development upon designated habitats would therefore need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.	
Landscape	The site is situated outside of the built up area, with an area of locally valued landscape – Cliffe Woods Farmland - which is considered sensitive to change. Development is thereby likely to have a detrimental impact upon locally valued local landscapes.	
Heritage	Development is unlikely to have an impact upon any designated heritage assets.	
Air Quality	Site may be constrained by air pollution but mitigation is likely to be deliverable.	
Contamination	Contamination is not suspected on the site.	
Site Developability	A major pipeline runs through or near to the site which main constrain development.	
Agricultural Land	The site is situated on the best and most versatile agricultural land.	
Open Space	Site is not designated open space.	

Suitability – Housing		
Flood Risk	Site is at low risk of flooding.	
Noise	Site is unlikely to be constrained by noise pollution.	
Amenity/Overlooking	The site has the potential to impact upon amenity of nearby residential properties. Whilst this is likely to be resolvable through sensitive design, it is likely this would have implications for site capacity.	
Employment Land	Site is not designated employment land.	
Overall	The site is considered unsuitable for development unless identified constraints	

	can be addressed.	

Suitability – Economic Development		
Flood Risk	Site is at low risk of flooding.	
Noise	Commercial uses on the site are unlikely to be constrained by noise pollution.	
Amenity	Mainly residential with few commercial uses.	
Overall	Site is unsuitable for employment uses.	

Suitability – Mixed Use		
Overall	The site is considered unsuitable for development unless identified constraints can be addressed.	

Availability	
Landowner is actively promoting the site for redevelopment through call for sites - housing	

REPRESENTATIONS TO MEDWAY COUNCIL LOCAL PLAN 2012 – 2035

Development Strategy Consultation Document

Submitted on Behalf of
The Landowners

June 2018

bartonwillmore.co.uk

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PLANNING / DESIGN / DELIVERY

REPRESENTATIONS TO MEDWAY COUNCIL LOCAL PLAN 2012 – 2035

DEVELOPMENT STRATEGY CONSULTATION DOCUMENT

SUBMITTED ON BEHALF OF THE LANDOWNERS

June 2018

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Date:	25 June 2018
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Date: 25 June 2018

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APPENDICES

Appendix 1: Sundridge Hill, Cuxton Location Plan

Appendix 2: Medway Council's Local Plan Development Options Consultation (under Regulation 18), March 2017

1.0 INTRODUCTION

1.1 These representations are submitted on behalf of the Landowner (Mr Santok Gill) in response to Medway Council's Local Plan 2012 – 2035 Development Strategy Consultation Document (MCDSCD) published in March 2018.

1.2 These representations focus on the promotion of a site known as 'Land south of Sundridge Hill, Cuxton' (The Site). A Site Location Plan is included at **Appendix 1**.

1.3 The Site comprises a single fallow field, redundant structures and single detached residential property, including associated hardstanding. Intermittent boundary vegetation, in the form of trees and hedgerows, runs along the northern boundary of the Site with the A228. The field is bound to the south by marshland and the Medway Valley railway line and to the west by a further field and an area of allotments. Residential dwellings bound the site to the north and east.

1.4 The Site forms part of a wider SLAA (Strategic Land Availability Assessment) site reference 1068 (South of Sundridge Hill, Cuxton) as identified in the Medway SLAA 2015 and 2017. The SLAA 2017 concludes that the site is unsuitable for allocation.

1.5 Notwithstanding our Clients' specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework [NPPF] (March 2012) and National Planning Practice Guidance [NPPG] (March 2014). Additionally, reference has been made to the Draft Revised NPPF (March 2018) and Draft NPPG (March 2018) which recently underwent consultation and is expected to come into force Summer 2018.

1.6 The MCDSCD forms a third stage in the Local Plan's preparation (under Regulation 18 of the Local Plan Regulations). Representations were previously submitted to Medway Council's Local Plan Development Options Consultation (under Regulation 18) in March 2017, a copy of which is included at **Appendix 2**.

1.7 These representations focus on relevant matters relating to the release of the Site for residential dwellings and address the following:

- Section 2 – National Planning Policy;
- Section 3 – Vision and Strategic Objectives;
- Section 4 – Delivering Sustainable Development – Options;
- Section 5 – Land south of Sundridge Hill, Cuxton.

i) Previous Representations

1.8 Representations were submitted in April 2017 to the Local Plan Development Options Consultations (January 2017). These representations were supported by an accompanying Accessibility Appraisal, Preliminary Ecological Appraisal and Landscape and Visual Appraisal which demonstrated there are no overriding accessibility, ecological or landscape constraints which preclude the allocation of the Site for residential purposes. These technical assessments remain relevant and will be drawn upon within these representations where necessary.

2.0 NATIONAL PLANNING POLICY

i) National Policy & Plan Making

2.1 The NPPF (March 2012) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF. These include:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high-quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
  (Para. 8)

2.2 The presumption in favour of sustainable development, as set out in the NPPF should be seen as a golden thread, running through both plan-making and decision-taking. For plan-making this means that:

- Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area;

- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted.
  (Para. 14).

2.3 LPAs should 'submit a plan for examination which it considers is "sound" – namely that is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and,
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

(Para. 182).

2.4 The NPPF considers that Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified. (Para. 157).

2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. (Para. 158).

ii) National Policy & Housing Need

2.6 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, 'Objectively Assessed Needs' (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.

2.7 LPAs should plan for a housing mix which takes into account "housing demand and the scale of housing supply necessary to meet this demand." Household and population projections should also be a key consideration, taking into account of migration and demographic change. (Para. 159).

2.8 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

> **Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.**
> (Reference ID: 2a-015-20140306)

2.9 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

> **The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.**
> (Reference ID: 2a-015-20140306)

iii) Duty to Co-operate

2.10 The 'Duty to Co-operate' between LPAs is a clear requirement of National planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross administrative boundaries, particularly such issues that relate to 'strategic priorities' as set out in para. 156. (Para. 178).

2.11 In addition, para. 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged. (Para. 180). LPAs are required to demonstrate how they have met the requirements of the 'Duty to Co-operate during the plan-making process. (Para. 181).

iv) Fixing Our Broken Housing Market (February 2017)

2.12 The recent Housing White Paper 'Fixing our broken housing market' (February 2017) reaffirms the Government's commitment to significantly increase levels of housing delivery to meet widely recognised acute housing shortfall.

2.13 Paragraph 1.29 states that plans should put in place policies to allow a good mix of sites to come forward for development to support small and medium sized sites, and thriving rural communities. Ensuring there is choice for consumers and that places can grow in ways that are sustainable.

2.14 Furthermore, paragraph 1.33 confirms the Government are seeking to amend the NPPF to expect local planning authorities to identify opportunities for villages to thrive. This has been carried through to the Draft Revised NPPF (March 2018), Rural Housing section.

v) Draft Revised NPPF (March 2018)

2.15 The Draft Revised NPPF was published for consultation in March 2018 and incorporates policy proposals previously consulted on in the Housing White Paper. The consultation closed on 10 May 2018. Whilst the revised NPPF is still in draft, it is anticipated[1] that the Medway Local Plan will be examined against the policy requirements of the new NPPF. It is thereby essential that MC has regard to the emerging NPPF policy requirements as it prepares the Regulation 19 Draft Plan.

[1] Para. 209 of the Draft NPPF states that *"policies in the previous framework will apply for the purposes of examining plans, where those plans are submitted on or before [six months after the date of publication]"*. The Government has indicated that it is aiming to publish the Final Revised NPPF in Summer 2018. Thereby this is very likely to be fully in force for the anticipated submission of the Medway Local Plan in March 2019.

2.16 The Draft Revised NPPF maintains a focus on the presumption in favour of sustainable development for plan-making and decision taking. Plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. Furthermore, strategic plans should, as a minimum, provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas, unless policies within the Framework that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development in the Plan area; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken a whole.

2.17 The Draft Revised NPPF retains its emphasis on significantly boosting the supply of homes, indicating that planning policies and decisions should help a sufficient amount and variety of land to come forward where it is needed and that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. (Para. 60). Furthermore, continued focus is placed on 'Building a strong, competitive economy' indicating that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local and business needs and wider opportunities for development (Paragraph 82).

2.18 Para. 75 notes that for applications which include housing, paragraph 11d of the Framework will apply if the LPA cannot demonstrate a five-year supply of deliverable housing sites (with the appropriate buffer), or where the Housing Delivery Test indicates that delivery of housing has been substantially (below 75% of the housing requirement) below the housing requirement over the previous three years.

2.19 Local Planning Authorities are requested to promote working with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes. (Para. 69).

2.20 Para. 79 sets out that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Furthermore, to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Additionally, Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. (Para. 80).

2.21 Planning policies and decisions should continue to enable the sustainable growth and expansion of all types of businesses in rural areas both through the conversion of existing buildings and well-designed new buildings. (Para. 83).

2.22 Notably, planning policies and decisions should recognise that sites to meet local businesses and community needs in rural areas may have to be found outside of existing settlements, and in locations that are not well served by public transport. In such cases, it is important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities for making a location more sustainable. The use of sites that are well-related to existing settlements should be encouraged where suitable opportunities exist. (Para. 84).

2.23 A new chapter, 'Making effective use of land' encourages planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

2.24 Furthermore, in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method included within the draft Planning Practice Guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In establishing this figure, any needs that cannot be met within neighbouring areas should also be taken into account. (Para. 61)

2.25 As detailed above and in respect of the Site, the draft revised NPPF is likely to introduce some policy changes which will have significant implications for the ongoing preparation of the Medway Local Plan.

vi) Draft Planning Practice Guidance (March 2018)

2.26 Alongside the Draft Revised NPPF, the Ministry of Housing Communities and Local Government (MHC&LG) is undertook a consultation on draft updates to planning practice guidance which will form part of the Government's online Planning Practice Guidance.

2.27 The draft NPPG includes changes to Housing Delivery. The draft NPPF and Guidance requires Local Planning Authorities to have an identified five-year housing land supply at all points during the Plan period. The draft NPPG suggests the monitoring of a five-year land supply through an annual position statement. Moreover, LPA's should demonstrate that a five-year supply of deliverable housing sites, with the appropriate buffer, can be shown where it has been established in a recently adopted plan, or in a subsequent annual position statement. The

starting point for calculating the five-year land supply should be housing requirement figures in local and strategic plans. However, where the plan is more than five years old and the housing figure needs revising, the starting point will be local housing need using the standard method.

2.28 The draft NPPG also sets out how the standard method for assessing Objectively Assessed Housing Need will be calculated.

3.0 DEVELOPMENT STRATEGY

Question DS1: Does the proposed spatial development strategy represent the most sustainable approach to managing Medway's growth?

What do you consider would represent a sound alternative growth strategy for the Medway Local Plan?

3.1 Section 3 of the MCDSCD sets out four development scenarios for consultation based on different growth targets and associated spatial distribution of housing land with common approaches to employment and retail land within the strategy. This can be broadly summarised as identified within the table below:

Scenario		Locational Strategy	Estimated Capacity (Units)
1	Meeting Objectively Assessed Need	• Strategy based on firstly directing growth to brownfield sites, proposed development of rural town at Hoo and some suburban expansion; • Based on North Kent Strategic Housing and Economic Needs Assessment (2015) OAN figure of 29,463 homes over the Plan period.	29,950
2	Investment in Infrastructure to unlock growth	• Development at a faster pace on Hoo Peninsula supported by passenger rail service, upgrade capacity of highway networks.	31,033
3	Meeting government's proposed calculation of Local Housing Need	• Development on Hoo Peninsula; • Land in the Capstone Valley and north and east of Rainham would be considered as potential allocations for development; • development of the urban opportunity areas and achieving high densities on sites;	35,961

Scenario		Locational Strategy	Estimated Capacity (Units)
		• Based on government's proposed standardised methodology which calculates a need for 37,143 homes over the Plan period. However this scenario still leaves a shortfall of 1,182 homes when compared against the Standard Method figure of 37,143 homes.	
4	Consideration of development within Lodge Hill SSSI	• Incorporates emerging proposals by Homes England for a revised scheme at Lodge Hill for up to 2000 homes as part of a wider strategic development of the wider Hoo rural town.	30,569

3.2 We recognise that scenario 3 seeks to deliver the highest quantum of growth from the above scenarios. However, it still falls short of meeting the Government's proposed Standardised Methodology for calculating housing need. The Draft Revised NPPF is clear that LPAs should meet their housing needs in full, and therefore MC needs to provide for the full Standard Method figure for Medway of 37,143 homes. **We recommend that MC seek to address this matter going forwards.**

3.3 Policy DS2: Spatial Development Strategy directs that the Council will consider a lesser scale of development in defined sites in suburban locations and also villages. We object to the reference of only specific locations, as there are more locations within Medway that are deemed sustainable locations. The policy is too prescriptive in this respect. Reference to specific locations should be removed as per below:

> **The council will consider a lesser scale of development in defined sites in suburban locations around Rainham and Capstone and ~~the~~ villages ~~of High Halstow, Lower Stoke, Allhallows, Grain and Halling~~, where the principles of sustainable development can be met, and where unacceptable impacts on infrastructure and the environment can be avoided.**

3.4 At present, no sites are proposed to be allocated under the 4 development scenarios in Cuxton. We note that other similar locations (in sustainability terms) such as High Halstow do include allocations and it is unclear within the evidence base why Cuxton has been excluded for potential allocations.

3.5 We consider that an appropriate level of growth proportionate to the village is essential to ensure the future vitality of the settlement. Particularly given the level of growth attributed to development of the rural town at Hoo and High Halstow. In the light of the need to meet the OAN figure in full, it is considered that additional allocations are necessary to meet the housing requirement.

4.0 HOUSING

Q.H1: Does the proposed policy for housing delivery represent a sound approach? Would you suggest an alternative approach?

4.1 In light of our comments relating to the previous section, we consider than an alternative approach is required to deliver a sound Plan. This includes increasing the housing requirement to meet the recognised Government Standard Method OAN figure.

4.2 Whilst we support and welcome the notion that the Plan recognises that unidentified development would be supported that is of a lesser scale in rural areas, the Plan should seek to proactively address how it intends to meet the housing requirement where identified sites where they exist. We consider that a pragmatic approach to development within villages needs to be assessed.

4.3 Notwithstanding, it is recognised that growth is needed in villages to promote vitality and we support that the Plan recognises the role that villages can play to meet the housing requirement. Additional development in Cuxton would help to maintain and enhance the vitality of existing services and facilities located in the village

i) Calculating Objectively Assessed Housing Need

4.4 As noted in Section 2 above, a key change emerging from the Draft NPPF is the requirement use the Government's 'standard methodology' to calculate OAN.

4.5 The standard method OAN figure for Medway is 37,143 over the Plan period, which equates to 1,665 dwellings per annum. Whilst it is recognised this is a large uplift, it is considered that this target is achievable and that sites are available to meet this target. It would be a critical failure of the Plan if it did not, as a starting point, seek to determine how it could meet this figure. The Plan does not presently undertake this exercise and therefore the plan is unsound in this respect. To not seek to meet this target would be a fundamental failure of the Council to proactively tackle meeting its own housing needs and indeed play its part in meeting the wider housing crisis.

4.6 It is disappointing that the MCDSCD has not endorsed the full standard methodology OAN figure for Medway when both the Housing White paper and draft revised NPPF both direct LPAs to meet the standardised housing target in full.

4.7 MC must fully accept the standard method figure as a starting point and should seek to meet this requirement, as is consistent with achieving sustainable development. MC should not seek to promote and justify an alternative OAN.

4.8 Paragraph 61 of the draft NPPF is clear that the standard methodology should be used unless there are 'exceptional circumstance' that justify an alternative approach. Whilst these 'exceptional circumstances' are not defined in the draft NPPF, with its echoes of well-established Green Belt policy, it is clear that this is a very high bar.

4.9 Whilst the MCDSCD appears to indicate that an alternative OAN figure may be preferred going forward (namely the 2015 SHMA figure), the consultation document fails to set out the necessary 'exceptional circumstances' which would be required to justify the alternative approach. We consider that in the absence of a robust exceptional circumstances justification the Local Plan is unsound.

4.10 It is however noted that the consultation document states at paragraph 3.9 that:

> **"It is recognised that areas may have important constraints, such as environmental designations, Green Belt, or physical constraints that restrict the ability to meet the needs in full. If this is robustly and soundly assessed, the plan may promote a housing target lower than the Local Housing Need figure. However, the council will be required to explore other options for meeting its area's housing needs, such as providing more land in a neighbouring borough."**

4.11 We note that this is <u>not</u> an exceptional circumstances justification for alternative OAN methodology. Rather this is an explanation for why the OAN cannot be met. This thereby relates to the Local Plan 'strategy' and the tests of Soundness (Para. 36) and the Presumption in Favour of Sustainable Development (Para. 11), rather than OAN methodology.

4.12 We consider that the Council must accept the standard method figure and work back from this to assess if this can be accommodated in accordance with the Presumption (Para. 11b). Whilst there may be evidence that the full standard method OAN cannot be accommodated without the *"adverse impacts of doing so significantly and demonstrably outweighing the benefits"*, this must be clearly set out through the SLAA and SA.

4.13 In summary, it would be inappropriate for the Council to seek to use an alternative approach to calculate OAN, because of an assumption that the Borough is constrained.

Q.H2: Does the proposed policy for housing mix represent a sound approach? Would you suggest an alternative approach?

4.14 We agree with the approach taken on housing mix and the principle that the mix should be appropriate to the size, location and characteristics of the site as well as to the established character and density of the neighbourhood. Policies on housing mix should allow sufficient flexibility to ensure that policy requirements are not particularly onerous and make developments unviable – especially in respect of small and medium sized sites.

Q.H3: Do you agree with the threshold for contributions for affordable housing and the percentage requirements for its provision? What do you consider would represent an effective alternative approach?

4.15 The SHMA (November 2015) (para 6.53) identifies that the affordable housing 'need' is greater than the identified affordable housing 'supply' over the projection period (2012 – 2037), the Local Plan period (2012 – 2035) and on an annual basis. The SHMA calculated a need for 18,592 affordable dwellings (744dpa), which would constitute 58% of MC's identified OAN figure of 1,281dpa. The PPG advises that an increase in the total Local Plan housing figure should be considered where it could help to deliver the required amount of affordable housing (Reference ID: 2a-029-20140306).

4.16 The need for affordable housing nevertheless, should be balanced against development viability considerations. The NPPF recognises that due consideration to viability and costs in plan-making and decision-taking should be taken to ensure sustainable development. The deliverability of the Plan is critical and as such, it is noted that *"the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."* (Para. 173). Furthermore, the NPPF acknowledges that to ensure viability the costs of any requirements likely to be applied to development, including affordable housing when taking account of the normal cost of development and mitigation, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

4.17 We acknowledge that the draft revised NPPF takes a different approach to viability, considering that this should be assessed at the Plan making stage and the use of viability assessment at the decision-making stage should not be necessary. Furthermore there are changes to the guidance on the methodology for assessing viability. Further guidance is required as to how this will work in practice.

4.18 We would consider that in light of the highlighted need for affordable housing provision as identified in the North Kent SHMA (November 2015), seeking the provision of up to 25% affordable housing is appropriate although, further viability evidence, in line with the draft revised NPPF is required to robustly assess the proportion of affordable housing provision for both rural and urban areas, given the Plan-led approach to viability.

Question H4: What do you consider would represent an effective split of tenures between affordable rent and intermediate in delivering affordable housing?

4.19 We consider that MC should develop policies related to affordable housing with reference to the draft revised NPPF, with flexibility to take into account the changes to the definition of affordable housing including the merging of social rented housing and affordable rented housing into one definition of affordable housing for rent, also encompassing Build to Rent schemes.

5.0 NATURAL ENVIRONMENT AND GREEN BELT

Question NE2: Do you consider that this is an effective approach to conserving and enhancing Medway's natural environment? What alternative approaches would you recommend to secure the favourable condition of these areas?

5.1 We support the Council's aspiration to promote the conservation and enhancement of biodiversity in Medway, by restricting development that could result in damage to designated wildlife areas and pursuing opportunities to strengthen biodiversity networks.

Question NE3: Do you consider that this is an effective approach to conserving and enhancing the special features of the Kent Downs AONB?
What alternative approaches would you recommend to secure the components of natural beauty?

5.2 Policy NE3: Kent Downs Area of Outstanding Natural Beauty, requires development proposals in the AONB and the setting of the downs to contribute to the conservation and enhancement of the natural beauty of this designated landscape. Furthermore, development must demonstrate that it has had regard to the Kent Downs Management Plan and associated policy guidance.

5.3 Although the Site is not within the Kent Downs AONB, it is within the setting and it is recognised that potential development proposals should have due regard to impacts on views to and from the AONB. We support that development proposals which affect the AONB should contribute to the conservation and enhancement of the natural beauty of the AONB, however, contributions should be relative and proportionate in scale to mitigate any potential impacts upon this designated landscape.

Question NE4: Do you consider that this is an effective approach to landscape policy in Medway? What alternative approaches would you recommend?

5.4 We support the notion that new development should provide for green infrastructure that supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation and seeks opportunities to strengthen the resilience of the natural environment.

6.0 TRANSPORT

Question T4: The optimum densities set out at Table 11.1 are likely to be achieved in the absence of this policy due to their central locations. Is it appropriate to increase these thresholds, subject to good design, and complemented by other initiatives, such as car clubs? For peripheral areas, is it appropriate to require a minimum of 35 dwellings per hectare? Would it be appropriate to include Cuxton and Halling stations in Table 11.1?

6.1 We consider that it would be appropriate to include Cuxton and Halling railway stations within table 11.1 which demonstrates optimum net residential densities for core, primary, secondary and periphery locations. There is considered to be strong potential for future growth within these areas to enhance the continued vitality of villages. The Site is located approximately 700m from Cuxton railway station and falls within the 'primary' zone category (within a 10 minute/800m walk).

7.0 BUILT ENVIRONMENT

Question BE1: Does the proposed policy for high quality design represent the most appropriate approach for the Medway Local Plan?
What do you consider would represent a sound alternative approach towards planning for high quality design in the Medway Local Plan?

7.1 We support the key principles and criteria outlined within draft Policy BE1 which generally align with the NPPF and draft revised NPPF.

Question BE2: Does the proposed policy for sustainable design represent the most appropriate approach for the Medway Local Plan?
What do you consider would represent a sound alternative approach towards sustainable design in the Medway Local Plan?

7.2 We consider that more detail is required to expand Policy BE2: Sustainable Design. The policy also makes no reference to targets for non-residential development.

Question BE3: Does the proposed policy for housing design represent the most appropriate approach for the Medway Local Plan?
What do you consider would represent a sound alternative approach for housing design in the Medway Local Plan?

7.3 Policy BE3: Housing Design requires all new accommodation, in addition to the general design policy to, as a minimum meet the relevant nationally described internal space standard for each individual unit; and as a minimum meet the Medway Housing Design Standard for external spaces. We consider that MC should ensure that it has sufficient evidence in relation to the need and viability of additional standards in line with the NPPG (Paragraph: 002 Reference ID: 56-002-2016051. Furthermore, we consider that there should be additional wording within the policy for flexibility to differ from these standards should specific site constraints identify that it would be difficult to achieve a high quality, well designed scheme with the imposed standards.

8.0 LAND SOUTH OF SUNDRIDGE HILL, CUXTON

8.1 The Site at Land South of Sundridge Hill, Cuxton, forms part of a site put forward to Medway Council's 'call for sites' Strategic Land Availability Assessment in May 2014 (SLAA site reference 1068, South of Sundridge Hill, Cuxton).

8.2 The SLAA 2015, and subsequent 2017 update, set out to identify sites with development potential for potential allocation as part of the emerging Local Plan. The Site was considered to be unsuitable at Stage 2 (Site Assessment) of the SLAA 2015. Further detailed commentary regarding the Site's suitability was set out within the previous representations in section 5. (**Appendix 2**)

i) Site Suitability - Overall

8.3 The SLAA 2015 notes that the Site is considered unsuitable for development unless identified constraints can be addressed. The previous representations identified that there are no unresolvable constraints in respect to any of the individual assessment criteria that have been identified. As such, the site is suitable for development and should be moved forward to the next stage of SLAA process.

8.4 The development would meet the three elements of sustainable development, as set out in the NPPF (para 7). Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase. The Site has deliverable potential to contribute towards much needed housing within rural Medway and would deliver a mix of housing types, including an element of affordable housing.

8.5 Furthermore, the development would help to enhance and maintain the vitality of the rural community of Cuxton, in line with Paragraph 55 of the NPPF.

8.6 The MCDSCD acknowledges that the Plan needs to achieve a balanced development strategy, meeting the needs of different sectors of the population looking for homes in Medway, including in rural areas (paragraph 4.4). Growth will be required in rural areas to maintain the vitality and viability of villages and their existing services and facilities. Furthermore, this is supported by the NPPF which recognises the support of thriving rural communities as a core planning principle.

8.7 The North Kent Strategic Housing and Economic Needs Assessment (November 2015) identifies Cuxton as being one of the key settlements outside of the urban area. However, there is extremely limited capacity for growth, with the Kent Downs Area of Outstanding Natural Beauty

(AONB) and Green Belt surrounding the village north, west and south, and areas of high flood risk to the east of the village. The Site, at Land south of Sundridge Hill, is located outside of these constraints, and therefore represents a significant opportunity for residential development which will help maintain and enhance the vitality of the village.

8.8 The Site is located within a sustainable location, within 700m of Cuxton railway station. The Site is accessible, located adjacent to the local road network with access proposed from the A228 Sundridge Hill and also served by local bus routes. Furthermore, the Site is located in close proximity to the strategic highway network with the M2 located approximately 0.5 miles to the north of the Site. The Accessibility Appraisal produced to support the previous representations demonstrate that the Site is located within walking distances to a wide range of local services and facilities. (**Appendix 2**).

8.9 The Site meets the NPPF's three dimensions of Sustainable Development and performs:

- *a social role*: by delivering housing that is if a suitable mix and quality including affordable to meet the need;
- *an economic role*: in bringing forward employment opportunities during the construction phases, increased in labour force to the area, additional expenditure to the local economy by future residents and New Homes Bonus; and
- *an environmental role*: in being well located to existing facilities and services as well as public transport routes. It will also provide for new areas of public open space and enhance biodiversity.

8.10 The Site is considered 'deliverable' in that it meets the requirements of footnote 11 of the NPPF and it has been demonstrated that the Site is currently available for development, will offer a suitable location for development and has a realistic prospect of housing being delivered on the Site within five years and that development of the Site is viable.

9.0 CONCLUSIONS

9.1 These representations are submitted on behalf of the Landowner focusing on promoting the Site known as 'Land south of Sundridge Hill, Cuxton'.

9.2 The Medway Integrated Growth Needs Assessment (November 2015) identifies that while there is a need to reinvigorate town centres and deliver sustainable development in locations that maximise existing infrastructure, the results of the Housing Needs Survey have indicated a desire for access to housing in rural areas. Furthermore, rural areas should be allowed to grow and diversify, through the provision of a range of property types, including some smaller units, helping to underpin their wider offer.

9.3 We recognise that scenario 3 seeks the greatest level of growth but it is likely to be considered unsound as it does not meet the Government's proposed Standardised Methodology for calculating housing need in full. We **recommend** that MC seek to address this matter going forwards.

9.4 We **recommended** amendments are made to Policy DS2: Spatial Development Strategy. This is on the basis that the current wording is inflexible and is not positively prepared or effective.

9.5 Any strategy for growth will need to have consideration to the desire for an increased access to housing in rural areas, which should be allowed to grow and diversify.

9.6 Presently we consider that the Plan is likely to be found unsound as set out within the NPPF, for the following reasons:

- Positively prepared & Justified– The MCDSCD does not seek to meet the full OAN set out within the Government's Standard Method figure for Medway of 37,143 homes in any development scenario. MC should be seeking to meet the standard method figure as a starting point.

- Effective – In order to meet the Government's Standard Method OAN, the Plan should ensure that enough housing sites are allocated to achieve a Plan that is deliverable.

- Consistent with national policy – It is very likely that the Plan will be examined under the new planning regime being drought forward through the draft revised NPPF which is expected to come into force during Summer 2018. It is critical that the next iteration of the Plan takes into account changes to the NPPF and is aligned with its policy direction.

i) Sustainable Development

9.7 The development would meet the three elements of sustainable development, as set out in the NPPF (para 7). Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase. The Site has deliverable potential to contribute towards much needed housing within rural Medway and would deliver a mix of housing types including affordable housing.

9.8 Furthermore, the development would help to enhance and maintain the vitality of the rural community of Cuxton, in line with Paragraph 55 of the NPPF.

9.9 The Site is being promoted for residential development and is 'available' for development. The technical assessments which will support emerging development proposals will demonstrate that the development proposals are 'suitable'.

9.10 The Site can be delivered in the first 5 years of the plan period and there are no overriding technical constraints to delivery. It is therefore 'achievable'.

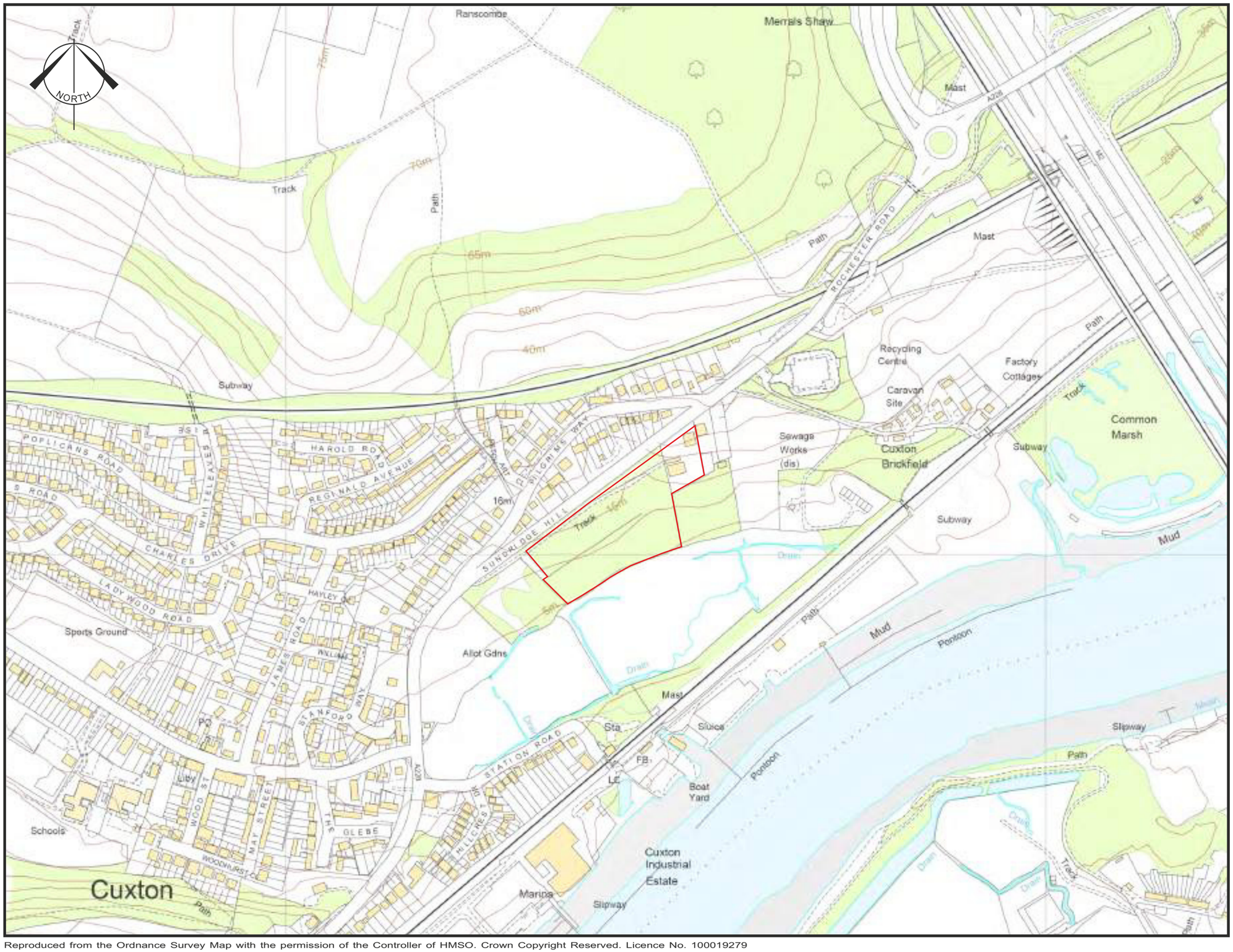
9.11 We consider the Site at Sundridge Hill, Cuxton represents an appropriate location for residential development, adjacent to the existing village of Cuxton. As identified in Section 5, there are no unresolvable constraints in respect to any of the SLAA criteria which preclude development of the Site.

9.12 The previously submitted Accessibility Appraisal, Preliminary Ecological Appraisal and Landscape and Visual Appraisal confirm there are no overriding accessibility, ecological or landscape constraints which preclude the allocation of the Site for residential purposes.

9.13 Development of the Site would help to enhance and maintain the vitality of the rural community of Cuxton. Accordingly, the Site should be allocated in the new Local Plan.

APPENDIX 1

SUNDRIDGE HILL, CUXTON LOCATION PLAN



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The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
-	-	-	-

KEY:

Site Area = 2.354 ha.

Project
SUNDRIDGE HILL, CUXTON

Drawing Title
Site Location Plan

Date	Scale	Drawn by	Check by
24/02/2017	1:5000@A3	GS	GW

Project No	Drawing No	Revision
25969	P1	A

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APPENDIX 2

MEDWAY COUNCIL'S LOCAL PLAN DEVELOPMENT OPTIONS CONSULTATION (UNDER REGULATION 18), MARCH 2017

REPRESENTATIONS TO MEDWAY COUNCIL LOCAL PLAN 2012 – 2035

Development Options Consultation Document

Submitted on Behalf of
The Landowners

April 2017

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REPRESENTATIONS TO MEDWAY COUNCIL LOCAL PLAN 2012 – 2035

Development Options Consultation Document

Submitted on Behalf of The Landowners

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APPENDICES

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Appendix 2: **Land South of Sundridge Hill – Site Proforma (Medway Council, November 2015).**

Appendix 3: **Accessibility Appraisal (dha transport, March 2017).**

Appendix 4: **Preliminary Ecological Appraisal (KB Ecology, March 2017).**

Appendix 5: **Landscape and Visual Appraisal (Barton Willmore, March 2017).**

1.0 INTRODUCTION

1.1 These representations are submitted on behalf of the Landowner (Mr Santok Gill) in response to Medway Council's Local Plan 2012 – 2035 Development Options Consultation Document (MCDOCD) published in January 2017.

1.2 These representations focus on the promotion of a site known as 'Land south of Sundridge Hill, Cuxton' (The Site). A Site Location Plan is included at **Appendix 1**.

1.3 The Site comprises a single fallow field, redundant structures and single detached residential property, including associated hardstanding. Intermittent boundary vegetation, in the form of trees and hedgerows, runs along the northern boundary of the Site with the A228. The field is bound to the south by marshland and the Medway Valley railway line and to the west by a further field and an area of allotments. Residential dwellings bound the site to the north and east.

1.4 The Site forms part of a wider SLAA (Strategic Land Availability Assessment) site reference 1068 (South of Sundridge Hill, Cuxton) as identified in the Medway SLAA 2015 and 2017. The SLAA 2017 concludes that the site is unsuitable for allocation.

1.5 Notwithstanding our Clients' specific land interests, these representations have been prepared in objective terms and in recognition of prevailing planning policy – in particular Government guidance as set out in the National Planning Policy Framework [NPPF] (March 2012) and National Planning Practice Guidance [NPPG] (March 2014).

1.6 The MCDOCD forms the first formal stage in the Local Plan's preparation (under Regulation 18 of the Local Plan Regulations).

1.7 These representations focus on relevant matters relating to the release of the Site for residential dwellings and address the following:

- Section 2 – National Planning Policy
- Section 3 – Vision and Strategic Objectives
- Section 4 – Delivering Sustainable Development - Options
- Section 5 – Land south of Sundridge Hill, Cuxton

1.8 These representations are supported by an accompanying Accessibility Appraisal, Preliminary Ecological Appraisal and Landscape and Visual Appraisal which have been produced to demonstrates there are no overriding accessibility, ecological or landscape constraints which preclude the allocation of the Site for residential purposes, as detailed in Section 5.

2.0 NATIONAL PLANNING POLICY

i) National Policy & Plan Making

2.1 The NPPF (March 2012) places a strong 'presumption in favour of sustainable development' in all planning related matters and places a responsibility on Local Planning Authorities (LPAs) to encourage and support sustainable growth and to plan positively for new development. There are three dimensions to sustainable development in relation to the planning system as outlined in the NPPF. These include:-

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
  (Para. 8)

2.2 The presumption in favour of sustainable development, as set out in the NPPF should be seen as a golden thread, running through both plan-making and decision-taking. For plan-making this means that:

> **Local Planning Authorities (LPAs) should positively seek opportunities to meet the development needs of their area;**
>
> **Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or – specific policies in the NPPF indicate development should be restricted.** (Para. 14)

2.3 LPAs should 'submit a plan for examination which it considers is "sound" – namely that is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and:
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

(Para. 182).

2.4 The NPPF considers that Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified. (Para. 157).

2.5 The NPPF directs that LPAs should use a proportionate evidence base in plan-making. LPAs should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. LPAs should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. (Para. 158).

ii) National Policy & Housing Need

2.6 The NPPF (para 47) requires LPAs to use their evidence base to ensure that their Local Plan meets the full, 'Objectively Assessed Needs' (OAN) for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the Plan period.

2.7 LPAs should plan for a housing mix which takes into account "housing demand and the scale of housing supply necessary to meet this demand." Household and population projections should also be a key consideration, taking into account of migration and demographic change. (Para. 159).

2.8 With regards to the methodology of assessing housing need and establishing a future housing requirement, the PPG (March 2014) states the following:

> **Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.**
> (Reference ID: 2a-015-20140306)

2.9 Although the official CLG household projections should therefore be considered, they only represent the starting point for assessing need. This is due to a number of reasons as the PPG explains:

> **The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.**
> (Reference ID: 2a-015-20140306)

2.10 The recent Housing White Paper 'Fixing our broken housing market' (February, 2017) reaffirms the Government's commitment to significantly increase levels of housing delivery to meet widely recognised acute housing shortfall.

iii) Duty to Co-operate

2.11 The 'Duty to Co-operate' between LPAs is a clear requirement of National planning policy, ensuring a proactive approach is taken to enable a collaborative way forward with plan-making. The NPPF directs that public bodies should work together to address planning issues that cross

administrative boundaries, particularly such issues that relate to 'strategic priorities' as set out in para. 156. (Para. 178).

2.12 In addition, para. 179 requires LPAs to practice joint working to work together to meet development requirements which cannot wholly be met within their own areas. Consideration should be given to producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans. Collaborative working between LPAs and private sector bodies, utility and infrastructure providers to deliver sustainable development with regards to strategic planning priorities is also encouraged. (Para. 180). LPAs are required to demonstrate how they have met the requirements of the 'Duty to Co-operate during the plan-making process. (Para. 181).

iv) The Housing White Paper - Fixing our Broken Housing Market (February 2017)

2.13 The recent Housing White Paper 'Fixing our broken housing market' (February 2017) reaffirms the Government's commitment to significantly increase levels of housing delivery to meet widely recognised acute housing shortfall.

2.14 Paragraph 1.29 states that plans should put in place policies to allow a good mix of sites to come forward for development to support small and medium sized sites, and thriving rural communities. Ensuring there is choice for consumers and that places can grow in ways that are sustainable.

2.15 Furthermore, paragraph 1.33 confirms the Government are seeking to amend the NPPF to expect local planning authorities to identify opportunities for villages to thrive.

3.0 VISION AND STRATEGIC OBJECTIVES

3.1 Section 2 of the MCDOCD sets out the context within the Local Plan will operate, identifying a projected 20% population increase in the District over the life of the plan. Paragraph 2.8 notes that a key task for the Local Plan is to manage growth to achieve development which delivers benefits for local people, including housing, new services and facilities.

3.2 As confirmed by paragraph 2.31 of the MCDOCD the Local Plan is an opportunity to establish a positive strategy to guide Medway's development over the next 18 years. The MCDOCD sets out a vision for 2035 which identifies, among other points, that new development in Medway's towns and villages will have responded positively to the character of the surrounding environment and the needs of existing communities.

3.3 Paragraph 2.39 identifies the Strategic Objectives underpinning the Local Plan to deliver the development and infrastructure needs of the District, whilst protecting and enhancing the natural, built and historic environment, including to provide for the housing needs of Medway's communities, that meets the range of size, type and affordability the area needs. Furthermore, the objectives seek to strengthen the role of Medway's town, neighbourhood and village centres to secure a range of accessible services and facilities for local communities.

3.4 We **support** the vision and strategic objectives identified by the Council.

3.5 The MCDOCD acknowledges that the plan needs to achieve a balanced development strategy, meeting the needs of different sectors of the population looking for homes in Medway, including in rural areas (paragraph 3.25). Paragraph 10.15 identifies that around 12% of Medway's population lives in the rural area and the Council recognises rural communities are particularly vulnerable to the loss of community facilities. Growth will therefore be required in rural areas to maintain the vitality and viability of villages and their existing services and facilities. Furthermore, this is supported by the NPPF which recognises the support of thriving rural communities as a core planning principle.

3.6 The North Kent Strategic Housing and Economic Needs Assessment (November 2015) identifies Cuxton as being one of the key settlements outside of the urban area. However, there is extremely limited capacity for growth, with the Kent Downs Area of Outstanding Natural Beauty (AONB) and Green Belt surrounding the village north, west and south, and areas of high flood risk to the east of the village. The Site, at Land south of Sundridge Hill, is located outside of these constraints, and therefore represents a significant opportunity for residential development which will help maintain and enhance the vitality of the village.

4.0 DELIVERING SUSTAINABLE DEVELOPMENT - OPTIONS

i) Objectively Assessed Need

4.1 The North Kent Strategic Housing and Economic Needs Assessment (SHENA, March 2015), jointly produced between Medway Council and Gravesham Borough Council, identifies a need for 29,463 homes in Medway Council area over the plan period (or 1,281 dwellings per annum), as acknowledged in Section 3 of the MCDOCD.

4.2 The SHENA derives an OAN of 1,281 dwellings per annum based on a starting point of the 2012-based CLG household projections. However, no revised OAN has been calculated based on the updated 2014-based CLG household projects which identify an increase in household projects by approximately 5.4% from the 2012-based projections.

4.3 Therefore, we **do not** consider that the assessed housing need, as calculated by Medway Council is "sound" or in line with National planning policy. The Council will need to address this and ensure there are sufficient housing sites allocated to meet the full OAN.

ii) Identified Supply of Development Land

4.4 Paragraph 3.7 of the MCDOCD sets out the Council's current anticipated supply of development land, as shown below in Table 4.1.

Table 4.1: Medway's Current Supply of Development Land

	Status	Number of Dwellings
A	Completions 2012-2016	2,180
B	Sites with planning permission	6,251
C	Medway Local Plan 2003 Allocations	356
D	SLAA Pipeline sites	8,813
E	Windfalls (Years 3-5 only)	606
F	**Total**	**18,206**

4.5 The Annual Monitoring Report (AMR) 2016 (Volume 2, Section 8) provides the list of SLAA residential pipeline sites, totalling 8,813 units for the Plan period. This list includes a number of Medway Local Plan 2003 Allocations, which are however listed as a separate source of supply above (Row C). As a result, it appears that such sites (i.e. Medway Local Plan 2003 Allocations) are accounted for as both a separate source of supply and a SLAA pipeline site i.e. have been double counted in the overall supply (Row F).

4.6 It is recommended that the Council revisits the inclusion of Medway Local Plan 2003 Allocations to ensure such sites are only accounted for once, to ensure MC's position is robust.

4.7 It is also noted that the January 2017 SLAA only identifies a potential capacity of 5,980 dwellings on sites deemed to be suitable, available and achievable for residential development; thereby conflicting with MC's figure of 8,813 units (Row D), published in the MCDOCD at the same time of the SLAA's release.

4.8 The 2016 AMR list of SLAA pipeline sites also includes Lodge Hill for 5,000 dwellings in the Plan period. This conflicts with the MCDOCD position (para 3.39) in which the development site is phased in the second half of the Plan period (2025-2035) given the present uncertainty. This will allow for consideration of the outcome of the Public Inquiry and allow time for alternative sources of land supply to be planned, if required.

4.9 The reliance of Lodge Hill for 5,000 units in the Plan period (in Row D) is not considered to be appropriate or realistic. It is contrary to the content and intentions of the MCDOCD to address future uncertainties by phasing development alter in the Plan period. Notwithstanding the site's continued uncertainty, it is also wholly unrealistic to anticipate 5,000 dwellings to be delivered in 2025-2035, which would require 500 dwellings to be built per annum.

4.10 The total supply of SLAA pipeline sites should be amended to be in accordance with the MCDOCD's position, which will significantly reduce the total supply of current development land in Medway. Additional land is therefore required to provide an identified supply of land to meet the development needs of circa 30,000 dwellings for the Plan period.

4.11 Furthermore, additional sources of supply may be required to address the potential exclusion of Lodge Hill.

iii) Options for Growth

4.12 The Council acknowledge, in paragraph 3.9, that it unlikely the full range of development needs will be met solely in identified regeneration areas on brownfield land. Therefore, greenfield sites in the suburban and rural areas may have to form a part of the Local Plan development strategy. However, the greenfield land should be free from environmental constraints, of lesser value for landscape and agricultural purposes, and well related to services and infrastructure. We **support** this position in Principle.

4.13 A considerable area of Medway is covered by environmental designations where development should be restricted, including wide swathes of the Hoo Peninsula, covered by Ramsar, Special Protection Area and Site of Special Scientific Interest designations. Furthermore, land in the Medway Valley and to the south of the urban area is in the Kent Downs Area of Natural Beauty. The MCDOCD acknowledges these constraints, as well as acknowledging the high risk of flooding across parts of the district, where inappropriate development, including housing, should be avoided.

4.14 The Medway Integrated Growth Needs Assessment (November 2015) identifies that while there is a need to reinvigorate town centres and deliver sustainable development in locations that maximise existing infrastructure, the results of the Housing Needs Survey have indicated a desire for access to housing in rural areas. Furthermore, rural areas should be allowed to grow and diversify, through the provision of a range of property types, including some smaller units, helping to underpin their wider offer. The North Kent Strategic Housing Market Assessment (November 2015) identifies that the main rural wards in Medway are Cuxton, Halling, Peninsula and Strood Rural. Growth in these main rural wards should be supported.

4.15 The MCDOCD identifies a range of scenarios demonstrating potential development patterns for the district, seeking to ensure sustainable growth, including offering access to services and facilities, while respecting the different aspects of the areas' environment.

4.16 All 4No. potential scenarios include incremental expansions of the villages, as shown on the maps included in Appendix 1B-1E of the MCDOCD, including Cuxton, Halling, Cliffe Woods, Cliffe, High Halstow, Allhallows, Grain and Lower Stoke. We support the recognition that the villages should be supported with development growth in order to maintain their vitality and viability.

4.17 Scenario 1 (Maximising the potential of urban regeneration) seeks to maximise development on brownfield sites, including redevelopment of employment sites at Medway City Estate and Chatham Docks. Appendix 1B of the MCDOCD identifies that there would be challenges associated with the delivery of large scale regeneration, including land assembly and impacts on transport networks. The scenario also identifies up to 7,000 dwellings being delivered across suburban and rural growth areas.

4.18 Scenario 2 (Suburban expansion) includes potential urban extensions around Rainham, Capstone and Strood, as well as the delivery of up to 3,000 dwellings at Lodge Hill and 2,000 dwellings at Hoo St Werburgh. Appendix 1C of the MCDOCD identifies that for this option a particular issue is the consideration of the review of the Green Belt boundary to bring forward development land. Furthermore, it notes that the consultation and ongoing work will determine

if there is a need to release land in the Green Belt or if provision for development needs can be met in other areas. The scenario identifies growth of villages to deliver 900 homes.

4.19 Scenario 3 (Rural focus) identifies potential for significant expansion of Hoo St Werburgh into a small town, including development of up to 6,500 dwellings, alongside up to 3,000 dwellings at Lodge Hill and 2,600 dwellings across the villages of Cliffe, Cliffe Woods, High Halstow, Lower Stoke, Allhallows and Grain. As noted in Appendix 1D, the scale of growth proposed in this scenario would require significant infrastructure investment. The scenario also identifies wider rural development to provide for a choice of sites, including 180 dwellings in the Medway Valley.

4.20 Scenario 4 (Urban regeneration and rural town) also identifies potential for significant growth in Hoo St Werburgh, for up to 6,500 dwellings, alongside the urban regeneration at Chatham Docks, Medway City Estate, Chatham and Strood waterfront and central areas, Mill Hill, and estate renewal in Tywdall to deliver 6,500 dwellings. The issues identified in Scenario 1 and 3 relating to the delivery of large scale regeneration and significant infrastructure investment are re-iterated for this scenario. The scenario identifies the provision of 650 dwellings across villages through incremental growth.

4.21 Paragraph 4.5 of the MCDOCD confirms that further work and supporting technical studies will be undertaken to help determine the capacity for areas to accommodate development and the most sustainable locations for growth. However, given the constraints to development within Medway Council area, and the identified shortfall between housing requirements and identified supply, we consider that a combination of the proposed scenarios will need to be considered to meet the growth requirements.

4.22 Any strategy for growth will need increase access to housing in rural areas, which should be allowed to grow and diversify. The final growth strategy for Medway will include the growth of villages, including those in the Medway Valley, to meet the identified range of development needs for the district.

4.23 As detailed in Section 5, the Site, at Land south of Sundridge Hill, Cuxton, represents a sustainable and appropriate site for residential development which would support the growth of Cuxton, a sustainable rural village identified for incremental growth in all 4No. scenarios set out in the MCDOCD. As noted in Section 3, Cuxton is a constrained location to deliver development, however it is important that it does accommodate growth to ensure its needs are met and the vitality of the village is maintained. As such, the Site is put forward for allocation for residential development to help deliver Medway's housing need.

5.0 LAND SOUTH OF SUNDRIDGE HILL, CUXTON

5.1 The Site at Land South of Sundridge Hill, Cuxton, forms part of a site put forward to Medway Council's 'call for sites' Strategic Land Availability Assessment in May 2014 (SLAA site reference 1068, South of Sundridge Hill, Cuxton).

5.2 The SLAA 2015, and subsequent 2017 update, set out to identify sites with development potential for potential allocation as part of the emerging Local Plan. As part of the SLAA 2015, the methodology undertaken enabled Medway Council to carry out Stage 1 (Site Identification) and Stage 2 (Site Assessment) of the Planning Policy Guidance methodology. The Stage 1 process enabled a number of sites to be excluded for further assessment should they be constrained by a restrictive designation, as identified within the NPPF (Footnote 9), the Site is not covered by any of these constraints and therefore continued to Stage 2 assessment.

5.3 Stage 2 (Site Assessment) of the SLAA 2015 identified the overall suitability of sites based on a number of criteria, including facilities and service accessibility, site access and landscape. As part of the Stage 2 process the site was identified as an unsuitable site.

5.4 As part of the SLAA Stage 2 process the Council released Site Assessment Proforma (November 2015) which provided an assessment of each site's suitability utilising a 'traffic light' methodology, with Green equating to unconstrained, Yellow being constraints that can be resolved and Red equalling unresolvable constraints. A copy of the Proforma for the Site is included in **Appendix 2**.

5.5 The Site was identified as scoring 'Red' on the following suitability criteria:

- Facilities and Services Accessibility;
- Landscape;
- Site Developability; and
- Overall suitability for housing, employment or mixed-use development.

5.6 The Site was identified as scoring 'Yellow' on the following suitability criteria:

- Public Transport Accessibility;
- Highway Network Capacity;
- Site Access;
- Ecological Potential;
- Designated Habitats;

- Air Quality;
- Agricultural Land;
- Flood Risk;
- Noise; and
- Amenity/Overlooking.

5.7 Table 5.1 provides an overview of the SLAA 2015 conclusions alongside our assessment on the site in regard to the criteria listed above.

Table 5.1 – SLAA 2015 and Site Assessment Comparison

Criteria	SLAA 2015	Site Assessment
Facilities & Services Accessibility	Site has poor access to services and facilities.	The SLAA 2015 bases the assessment of accessibility based on a site's proximity to typical services that might be used by residents. Given the rural location of Cuxton, a number of these services are beyond the distances considered acceptable. For example, the nearest dental surgery to Cuxton is located in Strood, beyond the 2km distance identified as accessible. Cuxton is still well serviced by existing facilities including a Medical Centre, shops (including a post office), Co-op supermarket, Infant and Junior school, public house, train station (located on the Medway Valley line) and existing sports and recreational facilities. The Site is located in close proximity to these, with the majority within the accessibility distances identified in the SLAA as identified in the accompanying Accessibility Appraisal (**Appendix 3**). The Site therefore has good access to the range of services required to meet local community needs and adequate access to all services overall, given the close proximity of the Site to public transport links.

Criteria	SLAA 2015	Site Assessment
Public Transport Accessibility	Site has moderate access to public transport opportunities	As detailed in the accompanying Accessibility Appraisal (**Appendix 3**) existing bus stops are located within 2 minutes walking distance, offering services between Chatham and Kings Hill (2 per hour), and within 8 minutes walking distance of Cuxton Railway Station offering service between Strood, Maidstone West and Tonbridge (4 per hour). The SLAA identifies that moderate access equates to 3 or 4 services an hour, whereas high frequency equates to five our more services an hour. As such, the Site is located within a High Frequency Catchment and should therefore be identified as 'Green'.
Highway Network Capacity	Access to the strategic highway network (M2/A2), and around the Medway urban distributor network generally, is likely to constrained by a number of identified congestion hotspots. Whilst it is possible that strategic infrastructure upgrades may address these congestion issues, improving capacity on the network, there are no upgrades planned or identified at present.	The Site is in an accessible location, in close proximity to the strategic highway network, with the M2 located approximately 700 metres north of the Site. No assessment of highways impact arising from development have been undertaken at this stage, however it is unlikely the proposed development would have a significant impact upon infrastructure that would preclude development. The SLAA conclusion therefore remains correct at this time.

Criteria	SLAA 2015	Site Assessment
	Further detailed assessment would need to be undertaken (as part of the Local Plan or development management process) to demonstrate how traffic generated be the development could be accommodated on the network. Developer contributions may be required to fund any infrastructure upgrades necessary to address network capacity constraints.	
Site Access	It is likely a suitable vehicular access could be created on to A228, which is directly adjacent to the site. Notwithstanding the above, the suitability of the prospective access would need to be further investigated through the Development Management Process.	The accompanying Accessibility Appraisal confirms that a suitable access from the A228 is achievable in the form of a simple priority junction. The Site does not have an existing suitable access to be identified as a 'Green' rating, however suitable access is achievable.

Criteria	SLAA 2015	Site Assessment
Ecological Potential	An ecological survey of the site has not been investigated as part of this high-level assessment and as such the presence or absence of protected species and/or habitats cannot be established at this stage. Further assessment would therefore need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.	A Preliminary Ecological Appraisal has been produced (**Appendix 4**) which concludes there are no further surveys considered necessary to support the promotion of the Site for allocation. However, there exists some potential for protected and otherwise notable species on the Site, and therefore further surveys are recommended to be undertaken in advance of any future planning application.
Designated Habitats	Natural England guidance (Impact Risk Zones) indicates that development of this site poses a potential risk to a SSSI. Further assessment of the potential impacts of development upon designated habitats would therefore need to be undertaken through the Local Plan or Development Management process,	The Site lies within a SSSI Impact Risk Zone, as identified by the SLAA, however, as confirmed by the accompanying Preliminary Ecological Appraisal, residential development is not listed as being a category for which the Council should consult Natural England. Therefore it is concluded the development is unlikely to pose any risk to nearby SSSI. As such, the Site should be identified as a 'Green' rating for this criteria.

Criteria	SLAA 2015	Site Assessment
	before development could be supported or rejected	
Landscape	The site is situated outside of the built up area, with an area of locally valued landscape of the Cuxton Scarp Foot, which is considered sensitive to change. Development is thereby likely to have a detrimental impact upon locally valued local landscapes.	A Landscape and Visual Appraisal of the Site has been prepared and supports these representations (**Appendix 5**). This concludes that the Site is located in an area of very poor quality landscape and development would be viewed as a minor element set back against and within the context of neighbouring residential, industrial and employment uses within the lower valley sides. The Site is located within the Cuxton Brickfields Areas of Local Landscape Importance (ALLI) and Strategic Gap but performs limited function to these designations. Development within the Site would not cause the settlement edge to extend further east or south than is currently the case, nor would it bring the settlement edge of Cuxton closer to Rochester or Strood. A number of opportunities and constraints are identified within the Landscape and Visual Appraisal which would be considered within any future development proposals. Therefore, it is considered as the Site is able to accommodate change with appropriate landscaping and mitigation and the SLAA has incorrectly identified the Site as being 'Red' for this criteria and should instead be identified as 'Yellow'.
Air Quality	Site may be constrained by air pollution but mitigation is likely to be deliverable.	At this stage the level of air pollution is unknown however it is not thought to be a constraint to development of the Site for residential development. As such, the SLAA conclusions are correct until further air quality work is undertaken.

Criteria	SLAA 2015	Site Assessment
Site Developability	The site has steep gradients that would make the site difficult to develop.	The village of Cuxton is located on the southern slopes of the Kent Downs AONB (albeit the village is outside of the AONB) with existing properties in the northern half of the village being located on this slope, inclined towards the River Medway. The Site forms part of this slope and therefore would not represent an uncharacteristic location for residential development. Residential development on the Site is developable and achievable within the parameters of the site, as such the Site should not be considered 'Red' for this criteria and should instead by identified as 'Yellow'.
Agricultural Land	Whilst the site is situated on agricultural land, it is understood to be Grade 3 or less. Notwithstanding the above further assessment of the agricultural land quality would need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.	The Site consists of a single fallow field which has not recently been used for agricultural purposes. However, the field is classified as Grade 3 agricultural land on the agricultural land classification maps and therefore the SLAA conclusions are correct.

Criteria	SLAA 2015	Site Assessment
Flood Risk	Level of flood risk on the site is considered acceptable.	The Site in in Flood Zone 1 with only a small area of low surface water flood risk. As such, the Site is at low risk of flooding and should be 'Green' for Flood Risk.
Noise	Noise pollution may affect the site, but it is likely that this could be mitigated.	The Site is not located in close proximity to any significant sources of noise pollution. Therefore, the Site should be 'Green' for Noise.
Amenity/Overlooking	The site has the potential to impact upon amenity of nearby residential properties. Whilst this is likely to be resolvable through sensitive design, it is likely this would have implications for site capacity.	The Site is located on the lower slopes of the valley with the nearest residential properties being located on the opposite side of the A228, these properties are on a higher topography than the site and will continue to experience un-interrupted views over the River Medway and opposite valley following development of the Site. The Site would therefore not impact upon amenity of nearby residential properties and should score 'Green' for Amenity/Overlooking.

i) Site Suitability - Overall

5.8 The SLAA 2015 notes that a site is considered suitable for development on the basis that no unresolvable constraints in respect to any of the individual criteria have been identified. As identified above there are no criteria where the Site can be shown to have unresolvable constraints. As such, the site is suitable and should be moved forward to the next stage of SLAA process.

5.9 The development would meet the three elements of sustainable development, as set out in the NPPF (para 7). Enabling residential development would support economic growth in Medway and surrounding areas, providing employment opportunities through the construction phase. The Site has deliverable potential to contribute towards much needed housing within rural Medway and would deliver a mix of housing types, including an element of affordable housing.

5.10 Furthermore, the development would help to enhance and maintain the vitality of the rural community of Cuxton, in line with Paragraph 55 of the NPPF. Paragraph 10.15 of the MCDOCD acknowledges that this is particular issue, with rural communities being particularly vulnerable to the loss of community facilities.

5.11 The Site is considered 'deliverable' in that it meets the requirements of footnote 11 of the NPPF and it has been demonstrated that the Site is currently available for development, will offer a suitable location for development and has a realistic prospect of housing being delivered on the Site within five years and that development of the Site is viable.

6.0 CONCLUSIONS

6.1 These representations are submitted on behalf of the Landowner focusing on promoting the Site known as 'Land south of Sundridge Hill, Cuxton'.

6.2 We consider that there is further work to be done in order to ensure Medway Council is working towards a "sound" Local Plan. Notably, we do not consider that the OAN target of 1,281dpa is sound. This matter should be addressed by the Council who need to ensure that there are sufficient housing sites allocated to meet the full OAN.

6.3 It is considered that a combination of 4no. development scenarios explored in the consultation document will need to be taken forward to meet Medway's development needs in full. All development scenarios include incremental expansion of the villages. We support the recognition that the villages should be supported with development growth in order to maintain their vitality and viability.

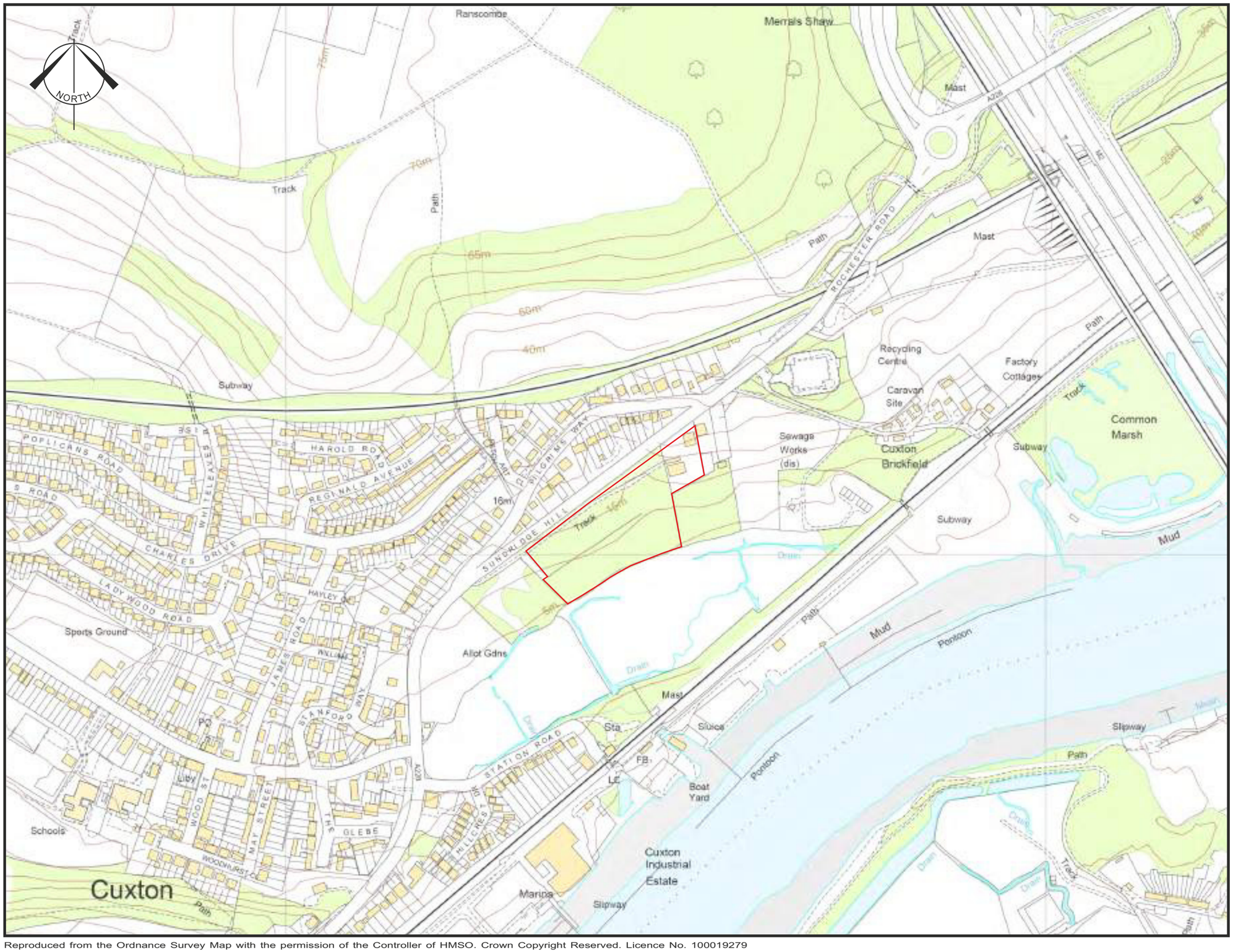
6.4 We consider the Site at Sundridge Hill, Cuxton represents an appropriate location for residential development, adjacent to the existing village of Cuxton. As identified in Section 5, there are no unresolvable constraints in respect to any of the SLAA criteria which preclude development of the Site.

6.5 The accompanying Accessibility Appraisal, Preliminary Ecological Appraisal and Landscape and Visual Appraisal confirm there are no overriding accessibility, ecological or landscape constraints which preclude the allocation of the Site for residential purposes.

6.6 Development of the Site would meet the three elements of sustainable development, as set out in the NPPF (para 7) and would help to enhance and maintain the vitality of the rural community of Cuxton. Accordingly, the Site should be allocated in the new Local Plan.

APPENDIX 1

Sundridge Hill, Cuxton Location Plan



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The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
-	-	-	-

KEY:

Site Area = 2.354 ha.

Project
SUNDRIDGE HILL, CUXTON

Drawing Title
Site Location Plan

Date	Scale	Drawn by	Check by
24/02/2017	1:5000@A3	GS	GW

Project No	Drawing No	Revision
25969	P1	A

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APPENDIX 2

SLAA Extract
Land south of Sundridge Hill – Site Proforma
(Medway Council, November 2015)

Site	
Reference	1068
Address	South of Sundridge Hill, Cuxton
Description	Very steeply sloping down from the main road. Some tree coverage on parts of the site. Sensitive landscape and green corridor. Vehicular access issues, realignment of road may well be necessary (new mini roundabout?). Also new footpath along frontage would be required. Main road is a major barrier, crossing to reach village facilities.
Size (ha)	3.1
Relevant policy guidance	
Location Plan	

Development Potential		
Residential (units)	90	
Employment (m^2)	Office	30,955
	Industrial	12,380
	Storage	12,380
Main Town Centre Uses (m^2)		
Other Uses		

Suitability - General		
Facilities & Services Accessibility	Site has poor access to services and facilities.	
Public Transport Accessibility	Site has moderate access to public transport opportunities.	
Highway Network Capacity	Access to the strategic highway network (M2/A2), and around the Medway urban distributor network generally, is likely to constrained by a number of identified congestion hotspots. Whilst it is possible that strategic	

Suitability - General		
	infrastructure upgrades may address these congestion issues, improving capacity on the network, there are no upgrades planned or identified at present. Further detailed assessment would need to be undertaken (as part of the Local Plan or development management process) to demonstrate how traffic generated be the development could be accommodated on the network. Developer contributions may be required to fund any infrastructure upgrades necessary to address network capacity constraints.	
Site Access	It is likely a suitable vehicular access could be created on to A228, which is directly adjacent to the site. Notwithstanding the above, the suitability of the prospective access would need to be further investigated through the Development Management Process.	
Ecological Potential	An ecological survey of the site has not been investigated as part of this high level assessment and as such the presence or absence of protected species and/or habitats cannot be established at this stage. Further assessment would therefore need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.	
Designated Habitats	Natural England guidance (Impact Risk Zones) indicates that development of this site poses a potential risk to a SSSI. Further assessment of the potential impacts of development upon designated habitats would therefore need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.	

Suitability - General		
Landscape	The site is situated outside of the built up area, with an area of locally valued landscape of the Cuxton Scarp Foot, which is considered sensitive to change. Development is thereby likely to have a detrimental impact upon locally valued local landscapes.	
Heritage	Development is unlikely to have an impact upon any designated heritage assets.	
Air Quality	Site may be constrained by air pollution but mitigation is likely to be deliverable.	
Contamination	Contamination is not suspected on the site.	
Site Developability	The site has steep gradients that would make the site difficult to develop.	
Agricultural Land	Whilst the site is situated on agricultural land, it is understood to be Grade 3 or less. Notwithstanding the above further assessment of the agricultural land quality would need to be undertaken through the Local Plan or Development Management process, before development could be supported or rejected.	
Open Space	Site is not designated open space.	

Suitability – Housing		
Flood Risk	Level of flood risk on the site is considered acceptable.	
Noise	Noise pollution may affect the site, but it is likely that this could be mitigated.	
Amenity/Overlooking	The site has the potential to impact upon amenity of nearby residential properties. Whilst this is likely to be resolvable through sensitive design, it is likely this would have implications for site capacity.	
Employment Land	Site is not designated employment land.	
Overall	The site is considered unsuitable for development unless identified constraints can be addressed.	

Suitability – Economic Development		
Flood Risk	Site is at low risk of flooding.	
Noise	Noise pollution may affect the site, but it is	

	likely that this could be mitigated for commercial uses.	
Amenity	Mixed commercial and residential area.	
Overall	Site is unsuitable for employment uses.	

Suitability – Mixed Use		
Overall	The site is considered unsuitable for development unless identified constraints can be addressed.	

Availability	
Landowner is actively promoting the site for redevelopment through call for sites - housing	

APPENDIX 3

Accessibility Appraisal
(dha transport, March 2017)

ACCESSIBILITY APPRAISAL

Site: Land South of Sundridge Hill, Cuxton

Client: Mr S Gill

Prepared by: DHA Transport
Eclipse House
Eclipse Park
Sittingbourne Road
Maidstone ME14 3EN

Date: March 2017

1.1 Introduction

1.1.1 This Technical Note (TN) has been prepared on behalf of Mr S Gill to accompany a representation to the Medway Local Plan consultation in respect to Land South of Sundridge Hill, Cuxton. The TN considers the sustainability and accessibility of the site in order to demonstrate its suitability to accommodate residential development in highways and access terms.

1.2 Location

1.2.1 The site presently comprises of an open agricultural field, which is bound to the south by marshland and the Medway Valley railway line and to the west by a further field and an area of allotments. Residential dwellings bound the site to the north and east. Figure 0-1 below identifies the site location in its local context.

Figure 0-1: Site Location (courtesy of Google Maps)

1.3 Access

1.3.1 It is proposed that access to the site will be achieved from the A228 Sundridge Hill in the form of a simple priority junction; an outline design of which is included at **Appendix A**. The access will be developed with an initial carriageway width of 5.5 metres, narrowing to 4.8 metres within the site confines. Kerb radii of 6.0 metres will be provided.

1.3.2 A footway will be provided on the western side of the proposed access road, measuring 1.8 metres in width. This footway will continue along the A228 frontage to the western site boundary. At this location, a pedestrian refuge island will be provided within the centre of the carriageway, accompanied by a dropped kerb, tactile paving arrangement. A new section of footway will be provided on the northern side of the A228, ceasing at the A228/Pilgrims Way junction, where an existing footway link to Cuxton village centre is available.

1.3.3 In accordance with the posted 40mph speed restriction along the site frontage, visibility splays from the site access of 2.4m by 120m are required. The proposed access design can accommodate for these splays, thereby ensuring sufficient visibility for egressing vehicles.

1.3.4 The existing central island on the A228 will be relocated to the east of its existing location. An informal right turn lane will be provided, to ensure vehicles entering the site do not obstruct following vehicles on the A228.

1.4 Accessibility

Walking and Cycle Infrastructure

1.4.1 As has been noted, an existing footway is provided on the northern side of Sundridge Hill to the west of the site, measuring approximately 2.0 metres in width. This footway provides a

continuous link to Cuxton village centre, where a range of services and facilities can be accessed.

1.4.2 In addition, a number of Public Rights of Way (PRoW) are located within the vicinity of the site, as shown in Figure 0-2 below. PRoW RS206 to the south of the site allows for connectivity with Strood and Rochester alongside the River Medway.

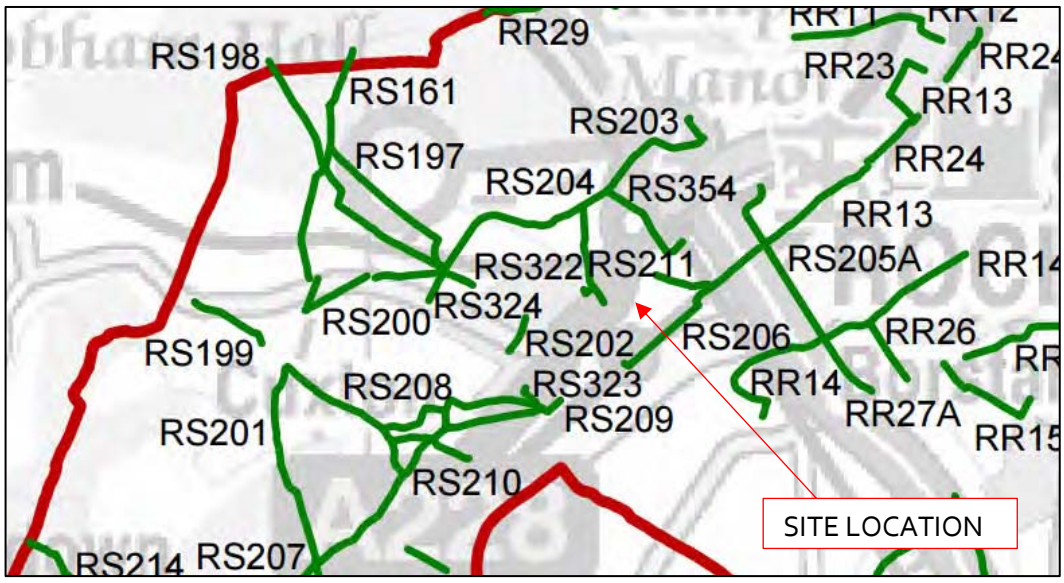


Figure 0-2: PRoW Network (courtesy of Medway Council)

1.4.3 The site is also well located in terms of cycle infrastructure, as shown in Figure 0-3 below. Regional Route 17, a short distance to the north east of the site, runs for 42 miles across Kent to the south coast and also provides connectivity to the Medway Towns.

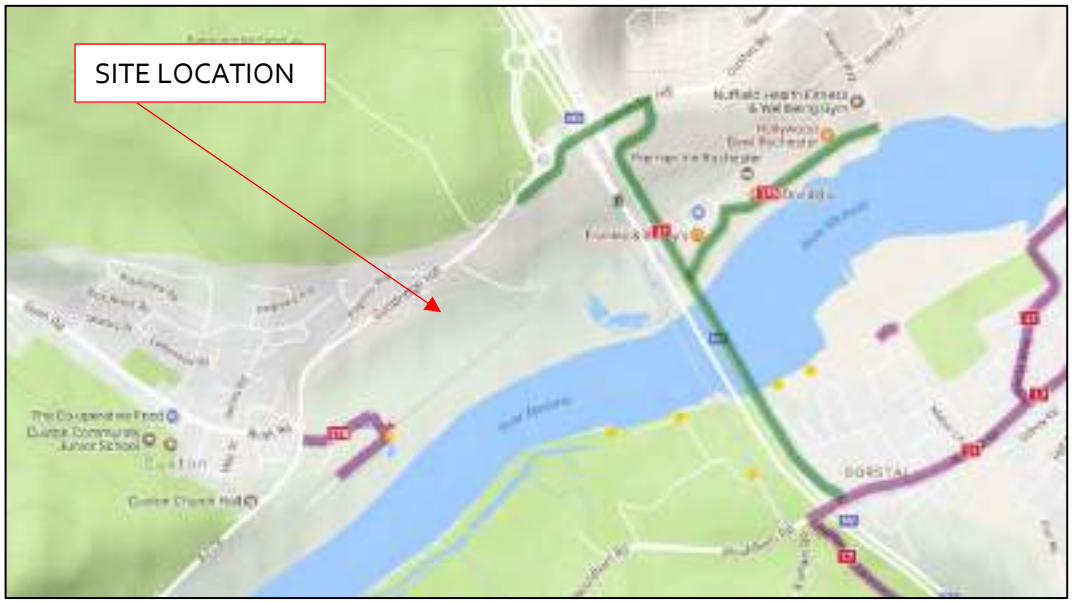


Figure 0-3: Local Cycle Network (courtesy of Sustrans)

Public Transport Facilities

1.4.4 The closest bus stops to the site are located on the A228, approximately 120 metres from the proposed site access, taking approximately 1.5 minutes on foot. From these stops, access to a number of bus services can be gained, a summary of which is provided in Table 0-1 below. The full timetables for these services are included at **Appendix B**.

Service No.	Route	Weekday Frequency
149	Chatham – Cuxton – Halling – Snodland – Kings Hill	School
Medway Valley Links 151	Chatham – Strood – Cuxton – Halling – Snodland – Kings Hill	Hourly
652	St Mary's Island – Wainscott – Strood – Cuxton – Strood Academy	School
653	Halling – Cuxton – Cookhham Wood Schools – Huntsman Corner	School
703	Maidstone – Larkfield – Halling – Cuxton – Bluewater	1 to 2 journeys*
E	Earl Estate – Cuxton – Holmesdale Technology College	School

Table 0-1: Summary of Bus Services and Frequencies

* Wednesdays and Saturdays only

1.4.5 Cuxton Railway Station is located approximately 700 metres from the site, taking 8 minutes on foot. This station is situated on the Medway Valley Line, which routes between Strood, Maidstone West and Tonbridge. On average, four services per hour operate from this

station, at a broadly half-hourly frequency in each direction. From Strood, London St Pancras is accessible via Southeastern High Speed services in 35 minutes.

Services and Amenities

1.4.6 A wide range of local services and facilities are located within an acceptable walking distance of the site. A summary of the walk distances to these destinations, as measured along walking routes and not taken 'as the crow flies', is provided in Table 0-2 below.

Facility	Walk Distance (m)	Walk Time (Minutes)
Bus Stop	120m	1.5
Auto Services	190m	2
White Hart Public House	400m	5
Mini Market and Takeaway Restaurants	650m	8
Cuxton Railway Station	700m	8
Cuxton Library	700m	8
Co-operative Food	750m	9
Cuxton Infant/Junior School	750m	9
Place of worship	750m	9

Table 0-2: Local Services and Amenities

1.4.7 The walk times provided above are based on a walk speed of 80m per minute, a figure which is widely used to estimate walk times and used within the London Based Public Transport Accessibility Level (PTAL) analysis. It aims to provide a typical average value that estimates it takes 5 minutes to walk 400m, 10 minutes to walk 800m and so on.

1.4.8 The range of services available within Cuxton, together with the proximity of frequent public transport links, has the potential to reduce future residents' reliance on private vehicles, in accordance with national and local planning policy.

1.5 Trip Distribution

1.5.1 Whilst a number of everyday facilities can be accessed on foot, it is acknowledged that vehicle usage will remain a significant mode of travel, given the proximity of the site to the strategic road network. With this in mind, a review of the likely trip distribution for car drivers in Middle Super Area Output Medway 028 – in which the site is situated – has been undertaken and is shown in Figure 0-4 below.

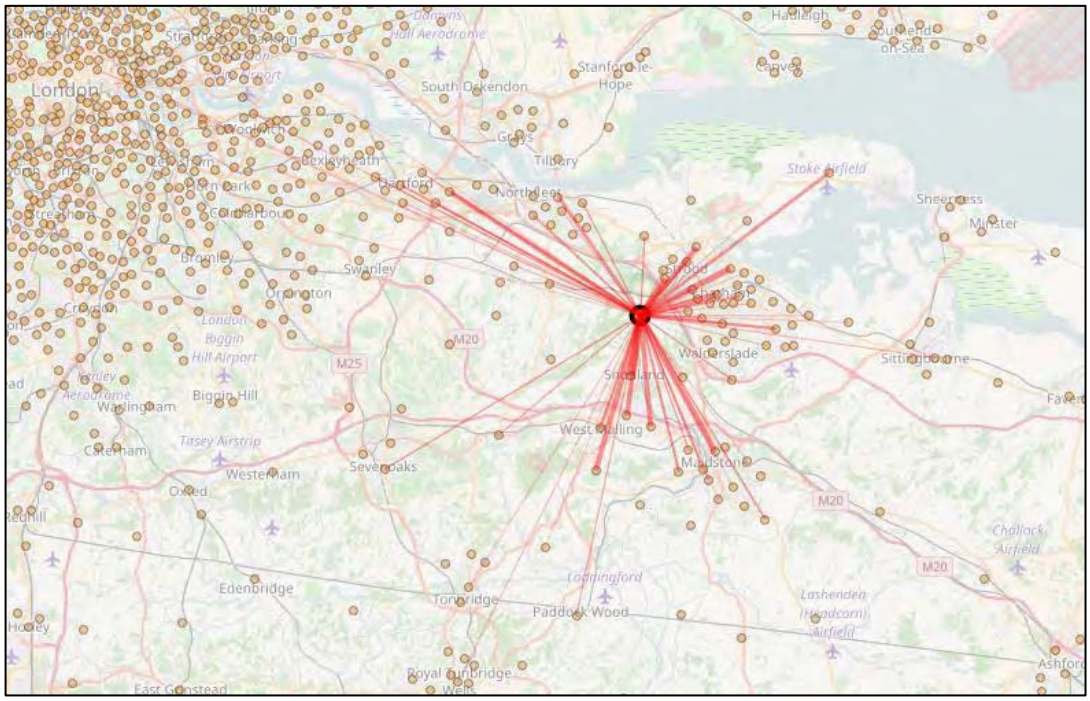


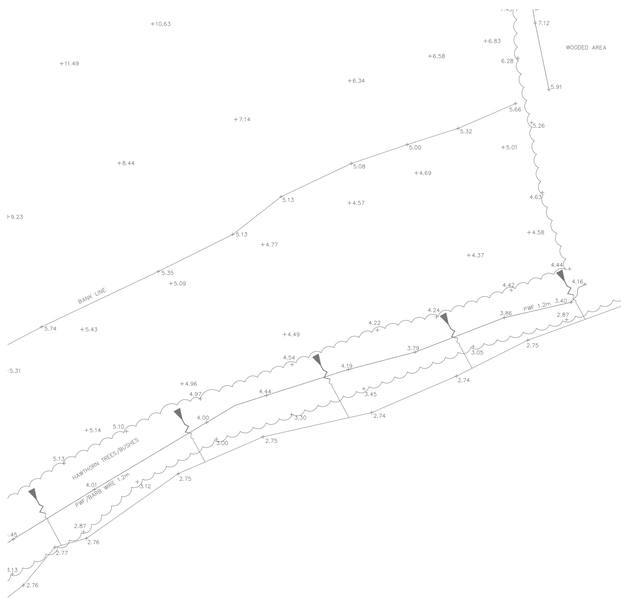
Figure 0-4: 2011 Census Journey to Work Data - Car Driver (courtesy of Datashine)

1.5.2 It is noted that the majority of vehicle movements are relatively short-distance in nature; predominantly to the Medway Towns, Maidstone and Dartford, and that many of these journeys can be viably undertaken by public transport.

1.6 Conclusion

1.6.1 This Technical Note (TN) has been prepared on behalf of Mr S Gill to accompany a representation to the Medway Local Plan consultation in respect to Land South of Sundridge Hill, Cuxton. It has been demonstrated that a residential development in this location would be accessible and sustainable in highways and access terms, offering residents viable opportunities to access everyday services and facilities by non-car modes. Vehicular and pedestrian access to the site from the A228 Sundridge Hill is considered to be feasible and can be provided in accordance with all relevant highway design standards.

Appendix A
Access Design



REV	AMENDMENTS	DATE	CHK
P1	FIRST ISSUE	02/03/17	CS

Client

MR S GILL

Project

SUNDRIDGE HILL, CUXTON

Title

PROPOSED ACCESS DESIGN

Drwg	Rev	Scale	Date
12203-T-01	P1	1:500	02.03.2017

dha transport

Eclipse House, Eclipse Park. Sittingbourne Road
Maidstone, Kent. ME14 3EN

t: 01622 776226 f: 01622 776227

e: info@dhaplanning.co.uk w: www.dhatransport.co.uk

CAD Reference: A1

Appendix B
Bus Timetables

Spring 2016

Issue 2, effective 21 February 2016

Medway Valley Links

Bus 149 & 151 times

Linking Malling with Medway

Medway Council
Serving You

Kent County Council
kent.gov.uk

Kings Hill - West Malling - Snodland - Halling - Cuxton - Chatham

BUS 149 & 151

Mondays to Fridays

Buses 77/149 times are shown for guidance only and cannot be guaranteed.

Code											TU-F SD	SD	NSD							
Bus Operator	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	AK	N-V	AK	AK	AK
Service number	151	151	151	151	151	151	151	151	151	149	149	151	151	151	151	151	151	151	151	151
Bus 77 from T Wells, arr Asda	-	-	-	0840	1005	1105	1205	1305	1405	-	1505	1505	-	1652	-	1857	-	-	-
Kings Hill *OPPOSITE ASDA*	-	-	-	0910	1010	1110	1210	1310	1433	-	1508	1523	1606	1703	-	1926	-	-	-
Kings Hill *Bovarde Ave*	-	-	-	0911	1011	1111	1211	1311	1434	-	1509	1524	1607	1704	-	1928	-	-	-
Kings Hill Forest Way	-	-	-	0913	1013	1113	1213	1313	1436	-	1511	1526	1609	1706	-	1930	-	-	-
Kings Hill *CAF*	-	-	-	0915	1015	1115	1215	1315	1438	-	1513	1528	1611	1708	-	1932	-	-	-
Kings Hill *ADJACENT ASDA*	-	0651	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
West Malling *High Street opp Tesco*	0618	0656	-	0920	1020	1120	1220	1320	1443	-	1518	1533	1616	1713	-	1937	-	-	-
West Malling Station	0620	0658	-	0922	1022	1122	1222	1322	1445	-	-	1535	1618	1715	-	1939	-	-	-
The Malling School	-	-	-	-	-	-	-	-	-	-	1529	-	-	-	-	-	-	-	-
Leybourne Church	0623	0701	-	0925	1025	1125	1225	1325	1448	-	1538	1538	1621	1718	-	1942	-	-	-
Ham Hill *opp Freemasons Arms*	0630	0708	-	0932	1032	1132	1232	1332	1455	-	1545	1545	1630	1727	-	1948	-	-	-
Holmesdale School	0632	0710	-	0934	1034	1134	1234	1334	1457	1520	1547	1547	1632	1729	-	1950	-	-	-
Snodland *St Benedict Rd*	0635	0713	-	0937	1037	1137	1237	1337	1500	-	1550	1550	1635	1732	-	1953	-	-	-
SNODLAND *Bull*	0638	0716	-	0940	1040	1140	1240	1340	1503	1523	1554	1554	1638	1735	-	1956	-	-	-
Halling *Howlsmere Close*	0642	0720	0900	0944	1044	1144	1244	1344	1507	1527	1558	1558	1642	1739	-	2000	-	-	-
Halling *New Bell Inn*	0643	0721	0901	0945	1045	1145	1245	1345	1508	1528	1559	1559	1643	1740	-	2001	2048	-	2243
Halling *opp Station*	0644	0722	0902	0946	1046	1146	1246	1346	1509	1529	1600	1600	1644	1741	-	2002	2049	-	2244
UPPER HALLING *Browndens Road*	-	0728	-	0952	-	1152	-	1352	1515	-	1606	1606	-	R	-	-	-	-	-
A228 St Andrews Park	0647	0735	0905	0959	1049	1159	1249	1359	1522	-	1613	1613	1647	17#44	-	2005	2051	-	2246
A228 Cuxton *opp White Hart*	0649	0737	0907	1001	1051	1201	1251	1401	1524	-	1615	1615	1649	17#46	-	2007	2053	-	2248
Cuxton Charles Drive *opp Whiteleaves*	-	0740	0910	-	1054	-	1254	-	-	-	1618	1618	-	-	-	-	-	-	-
Cuxton *opp Scout Hut*	-	0743	0913	-	1057	-	1257	-	-	-	1621	1621	-	-	-	-	-	-	-
Medway Valley Park Cinema	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1935	-	2058	2143	2253
STROOD *Canal Rd, Bus Stop D*	0656	0751	0921	1009	1105	1209	1305	1409	1532	-	1629	1629	1657	17#54	1941	2014	2104	2149	2259
Rochester Railway Station	0658	0753	0923	1011	1107	1211	1307	1411	1534	-	1631	1631	1659	17#56	1943	2016	2106	2151	2301
Chatham Stn *New Cut Fire Stn*	0702	0757	0927	1015	1111	1215	1311	1415	1538	-	1635	1635	1703	18#00	-	2020	-	-	-
CHATHAM *Waterfront Bus Station*	0704	0800	0930	1018	1114	1218	1314	1418	1541	-	1638	1638	1708	18#05	1950	2023	2113	2158	2308
Chatham Maritime *Ship & Trades*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1955	-	2118	2203	2312
ST MARY'S ISLAND *Goldcrest Drive*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1957	-	2120	2205	2315

EXPLANATION OF CODES ON THIS PAGE

SD Schooldays only

NSD Not schooldays

TU-F SD Tuesdays to Fridays schooldays only; starts inside Holmesdale School grounds

N-V Journey operated by Nu-Venture

AK Journey operated by Arriva

R Calls on request to set down only for passengers boarding at/before Halling Station

Bus may run up to 8 minutes later at this point if Upper Halling has been served on request

Chatham - Cuxton - Halling - Snodland - West Malling - Kings Hill

Mondays to Fridays

Buses 77/149 times are shown for guidance only and cannot be guaranteed.

Code		SD	SD	NSD															
Bus Operator	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	AK	AK	AK	AK	AK
Service number	151	149	149	151	151	151	151	151	151	151	151	151	151	151	151	151	151	151	151
ST MARY'S ISLAND *Goldcrest Drive*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1901	2014	2121	2211	2316
CHATHAM MARITIME *Dockside Outlet*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1904	2017	-	-	-
CHATHAM *Waterfront Bus Station A5*	0550	-	0709	0720	0846	0950	1050	1150	1250	1350	1505	1552	1713	1826	1910	2023	2128	2218	2323
Chatham Rail Stn *Bus Stop A*	0552	-	0711	0722	0848	0952	1052	1152	1252	1352	1507	1554	1715	1828	1913	2026	2131	2221	2326
opp Rochester Railway Station	0556	-	0715	0726	0852	0956	1056	1156	1256	1356	1512	1559	1720	1832	1916	2029	2134	2224	2329
STROOD *Morrisons*	0600	-	0719	0730	0856	1002	1102	1202	1302	1402	1518	1606	1727	1836	1919	2032	2137	2227	2332
Medway Valley Park Cinema	0605	-	-	-	-	-	-	-	-	-	-	-	-	-	1924	2037	2142	2232	2337
Cuxton Charles Drive *opp Whiteleaves*	-	-	0729	0740	0906	-	1112	-	1312	1412	-	1618	R	-	-	-	-	-	-
Cuxton *opp Scout Hut*	-	-	0732	0743	0909	-	1115	-	1315	1415	-	1621	R	-	-	-	-	-	-
A228 Cuxton *White Hart*	0611	-	-	-	-	1010	-	1210	-	-	1526	-	17Y35	1844	-	2042	-	2237	2342
A228 St Andrews Park	0613	-	0735	0746	0912	1012	1118	1212	1318	1418	1528	1624	17Y38	1846	-	2044	-	2239	2344
UPPER HALLING *Browndens Road*	-	-	0742	0753	0919	1019	-	1219	-	1425	-	-	R	-	-	-	-	-	-
Halling Station	0615	-	0748	0759	0925	1025	1121	1225	1321	1431	1531	1627	17Y41	1848	-	-	-	-	-
Halling *Church*	0616	-	0749	0800	0926	1026	1122	1226	1322	1432	1532	1628	17Y42	1849	-	2047	-	2242	2347
Halling *Howlsmere Close*	0617	-	0750	0801	0927	1027	1123	1227	1323	1433	1533	1629	17Y43	1850	-	-	-	-	-
SNODLAND *opp The Bull*	0621	0735	0755	0805	0931	1031	1127	1231	1327	1437	1537	1633	17Y47	1854	-	-	-	-	-
St. Benedict Road *Freelands Road*	0623	DIRECT	0758	0807	0933	1033	1129	1233	1329	1439	DIRECT	1635	17Y49	1856	-	-	-	-	-
Ham Hill *Freemasons Arms*	0628	0741	0805	0812	0938	1038	1134	1238	1334	1444	1542	1640	17Y54	1901	-	-	-	-	-
opp Leybourne Church	0632	0745	0809	0816	0942	1042	1138	1242	1338	1448	1546	1644	17Y58	1905	-	-	-	-	-
The Malling School	-	0754	0818	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
West Malling Station	0638	-	-	0822	0948	1048	1144	1248	1344	1454	1552	1650	18Y04	1911	-	-	-	-	-
West Malling *High Street Tesco*	0640	0800	0824	0824	0950	1050	1146	1250	1346	1456	1554	1652	18Y06	1913	-	-	-	-	-
Kings Hill *OPPOSITE ASDA*	0646	-	-	-	-	-	-	-	-	1502	1600	1658	-	1919	-	-	-	-	-
Kings Hill *opp CAF*	-	-	0830	0830	0956	1056	1152	1256	1352	-	-	-	18Y12	-	-	-	-	-	-
Kings Hill *Discovery Drive*	-	-	0832	0832	0958	1058	1154	1258	1354	-	-	-	18Y14	-	-	-	-	-	-
Kings Hill *Bovarde Avenue*	-	-	0834	0834	1000	1100	1156	1300	1356	-	-	-	18Y16	-	-	-	-	-	-
Kings Hill *ADJACENT ASDA*	-	-	0836	0836	1002	1102	1158	1302	1358	-	-	-	18Y18	-	-	-	-	-	-
Bus 77 to T Wells dep Asda	0658	-	0907	0907	1007	1107	1207	1307	1407	1507	-	1711	1847	2031	-	-	-	-	-

EXPLANATION OF CODES ON THIS PAGE

SD Schooldays only
NSD Not schooldays
N-V Journey operated by Nu-Venture
AK Journey operated by Arriva
R Calls on request to set down only for passengers boarding at/before Sundridge Hill
Y Bus may run up to 11 mins later at this point if Cuxton and/or Upper Halling have been served on request

Kings Hill - West Malling - Snodland - Halling - Cuxton - Chatham

Saturdays

Buses 77/149 times are shown for guidance only and cannot be guaranteed.

Bus Operator	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	AK	N-V	AK	AK	AK			
Service number	151	151	151	151	151	151	151	151	151	151	151	151	151	151	151	151			
Bus 77 from T Wells, arr Asda	-	-	0905	1005	1105	1205	1305	1405	1505	1605	1705	-	1905	-	-	-	-	-	-
Kings Hill *OPPOSITE ASDA*	-	-	0910	1010	1110	1210	1310	1410	1510	1610	1710	-	1926	-	-	-	-	-	-
Kings Hill *Bovarde Ave*	-	-	0911	1011	1111	1211	1311	1411	1511	1611	1711	-	1928	-	-	-	-	-	-
Kings Hill *Forest Way*	-	-	0913	1013	1113	1213	1313	1413	1513	1613	1712	-	1930	-	-	-	-	-	-
Kings Hill *CAF*	-	-	0915	1015	1115	1215	1315	1415	1515	1615	1715	-	1932	-	-	-	-	-	-
West Malling *High Street opp Tesco*	-	0736	0920	1020	1120	1220	1320	1420	1520	1620	1720	-	1937	-	-	-	-	-	-
West Malling Station	-	0738	0922	1022	1122	1222	1322	1422	1522	1622	1722	-	1939	-	-	-	-	-	-
Leybourne Church	-	0741	0925	1025	1125	1225	1325	1425	1525	1625	1725	-	1942	-	-	-	-	-	-
Ham Hill *opp Freemasons Arms*	0716	0748	0932	1032	1132	1232	1332	1432	1532	1632	1732	-	1948	-	-	-	-	-	-
Snodland *St Benedict Rd*	-	0753	0937	1037	1137	1237	1337	1437	1537	1637	1737	-	1953	-	-	-	-	-	-
SNODLAND *Bull*	0720	0756	0940	1040	1140	1240	1340	1440	1540	1640	1740	-	1956	-	-	-	-	-	-
Halling Howlsmere Close	0724	0800	0944	1044	1144	1244	1344	1444	1544	1644	1744	-	2000	-	-	-	-	-	-
Halling *New Bell Inn*	0725	0801	0945	1045	1145	1245	1345	1445	1545	1645	1745	-	2001	2048	-	2243	-	-	-
Halling *opp Station*	0726	0802	0946	1046	1146	1246	1346	1446	1546	1646	1746	-	2002	2049	-	2244	-	-	-
UPPER HALLING *Browndens Road*	0732	0808	0952	-	1152	-	1352	-	1552	-	-	-	-	-	-	-	-	-	-
A228 St Andrews Park	0739	0815	0959	1049	1159	1249	1359	1449	1559	1649	1749	-	2005	2051	-	2246	-	-	-
A228 Cuxton *opp White Hart*	0741	0817	1001	1051	1201	1251	1401	1451	1601	1651	1751	-	2007	2053	-	2248	-	-	-
Cuxton Charles Drive *opp Whiteleaves*	-	0820	-	1054	-	1254	-	1454	-	-	-	-	-	-	-	-	-	-	-
Cuxton *opp Scout Hut*	-	0823	-	1057	-	1257	-	1457	-	-	-	-	-	-	-	-	-	-	-
Medway Valley Park Cinema	-	-	-	-	-	-	-	-	-	-	-	1935	-	2058	2143	2253	-	-	-
STROOD *Canal Rd, Bus Stop D*	0748	0831	1009	1105	1209	1305	1409	1505	1609	1658	1758	1941	2014	2104	2149	2259	-	-	-
Rochester Railway Station	0750	0833	1011	1107	1211	1307	1411	1507	1611	1700	1800	1943	2016	2106	2151	2301	-	-	-
Chatham Stn *New Cut Fire Stn*	0754	0837	1015	1111	1215	1311	1415	1511	1615	1704	1804	-	2020	-	-	-	-	-	-
CHATHAM *Waterfront Bus Station*	0756	0839	1018	1114	1218	1314	1418	1514	1618	1707	1807	1950	2023	2113	2158	2308	-	-	-
Chatham Maritime *Ship & Trades*	-	-	-	-	-	-	-	-	-	-	-	1955	-	2118	2203	2312	-	-	-
ST MARY'S ISLAND *Goldcrest Drive*	-	-	-	-	-	-	-	-	-	-	-	1957	-	2120	2205	2315	-	-	-

EXPLANATION OF CODES ON THIS PAGE

N-V Journey operated by Nu-Venture
AK Journey operated by Arriva

Chatham - Cuxton - Halling - Snodland - West Malling - Kings Hill

BUS 151

Saturdays

Buses 77/149 times are shown for guidance only and cannot be guaranteed.

Bus Operator	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	N-V	AK	AK	AK	AK	AK
Service number	151	151	151	151	151	151	151	151	151	151	151	151	151	151	151	151
ST MARY'S ISLAND *Goldcrest Drive*	-	-	-	-	-	-	-	-	-	-	-	1901	2014	2121	2211	2316
CHATHAM MARITIME *Dockside Outlet*	-	-	-	-	-	-	-	-	-	-	-	1904	2017	-	-	-
CHATHAM *Waterfront Bus Station A5*	0804	0844	0950	1050	1150	1250	1350	1450	1550	1713	1824	1910	2023	2128	2218	2323
Chatham Rail Stn *Bus Stop A*	0806	0846	0952	1052	1152	1252	1352	1452	1552	1715	1826	1913	2026	2131	2221	2326
opp Rochester Railway Station	0810	0850	0956	1056	1156	1256	1356	1456	1556	1718	1830	1916	2029	2134	2224	2329
STROOD *Morrisons*	0814	0856	1002	1102	1202	1302	1402	1502	1602	1724	1835	-	-	-	-	-
Medway Valley Park	-	-	-	-	-	-	-	-	-	-	-	1924	2037	2142	2232	2337
Cuxton Charles Drive *opp Whiteleaves*	-	0906	-	1112	-	1312	-	1512	-	R	-	-	-	-	-	-
Cuxton *opp Scout Hut*	-	0909	-	1115	-	1315	-	1515	-	R	-	-	-	-	-	-
A228 Cuxton *White Hart*	0821	-	1010	-	1210	-	1410	-	1610	1734	1843	-	2042	-	2237	2342
A228 St Andrews Park	0823	0912	1012	1118	1212	1318	1412	1518	1612	1736	1845	-	2044	-	2239	2344
UPPER HALLING *Browndens Road*	-	0919	1019	-	1219	-	1419	-	1619	R	-	-	-	-	-	-
Halling Station	0825	0925	1025	1121	1225	1321	1425	1521	1625	17Y39	1848	-	-	-	-	-
Halling Church	0826	0926	1026	1122	1226	1322	1426	1522	1626	17Y40	1849	-	2047	-	2242	2347
Halling *Howlsmere Close*	0827	0927	1027	1123	1227	1323	1427	1523	1627	17Y41	1850	-	-	-	-	-
SNODLAND *opp The Bull*	0831	0931	1031	1127	1231	1327	1431	1527	1631	17Y45	1854	-	-	-	-	-
St. Benedict Road *Freelands Road*	0833	0933	1033	1129	1233	1329	1433	1529	1633	17Y47	1856	-	-	-	-	-
Ham Hill *Freemasons Arms*	0838	0938	1038	1134	1238	1334	1438	1534	1638	17Y51	1901	-	-	-	-	-
opp Leybourne Church	0842	0942	1042	1138	1242	1338	1442	1538	1642	17Y55	1905	-	-	-	-	-
West Malling Station	0848	0948	1048	1144	1248	1344	1448	1544	1648	18Y01	1911	-	-	-	-	-
West Malling *High Street Tesco*	0850	0950	1050	1146	1250	1346	1450	1546	1650	18Y03	1913	-	-	-	-	-
Kings Hill *opp ASDA*	-	-	-	-	-	-	-	-	-	-	1919	-	-	-	-	-
Kings Hill *opp CAF*	0856	0956	1056	1152	1256	1352	1456	1552	1656	18Y09	-	-	-	-	-	-
Kings Hill *Discovery Drive*	0858	0958	1058	1154	1258	1354	1458	1554	1658	18Y11	-	-	-	-	-	-
Kings Hill *Bovarde Avenue*	0900	1000	1100	1156	1300	1356	1500	1556	1700	18Y13	-	-	-	-	-	
Kings Hill *ADJACENT ASDA*	0902	1002	1102	1158	1302	1358	1502	1558	1702	18Y15	-	-	-	-	-	-
Bus 77 to T Wells dep Asda	0907	1007	1107	1207	1307	1407	1507	1607	1707	1830	2031	-	-	-	-	-

EXPLANATION OF CODES ON THIS PAGE

N-V Journey operated by Nu-Venture

AK Journey operated by Arriva

R Calls on request to set down only for passengers boarding at/before Sundridge Hill

Y Bus may run up to 11 mins later at this point if Cuxton and/or Upper Halling have been served on request

West Malling - Snodland - Halling - Cuxton - Medway Valley Park Chatham - St Mary's Island — BUS 151

Sundays - also Bank, National & Public Holidays. Not 25/26 December

Bus Operator	N-V	N-V	N-V	N-V	N-V	N-V
Service number	151	151	151	151	151	151
WEST MALLING *High St opp TESCO**	-	0957*	1202*	1402*	1602	1802
West Malling Station*	-	0959*	1204*	1404*	1604	1804
Leybourne Church	-	1002	1207	1407	1607	1807
HAM HILL *opp Freemasons Arms*	-	1009	1214	1414	1614	1814
Snodland *St Benedict Rd*	-	1013	1218	1418	1618	1818
SNODLAND *The Bull*	-	1016	1221	1421	1621	1821
Halling *Howlsmere Close*	-	1019	1224	1424	1624	1824
Halling *New Bell Inn*	-	1020	1225	1425	1625	1825
Halling opp Station	-	1021	1226	1426	1626	1826
A228 St Andrews Park	-	1023	1228	1428	1628	1828
A228 Cuxton *opp White Hart*	-	1026	1231	1431	1631	1831
Medway Valley Park	-	1032	1237	1437	1637	1837
STROOD *Canal Rd, Bus Stop D*	-	1039	1244	1444	1644	1844
Rochester Railway Station	-	1041	1246	1446	1646	1846
CHATHAM STATION *New Cut, Fire Stn*	-	-	1250	1450	1650	-
Chatham Rail Stn, *Bus Stop B*	0845	1045	-	-	-	1850
CHATHAM *Waterfront Bus Station*	0847	1047	1253	1453	1653	1852
Chatham Maritime *Ship & Trades*	0851	1051	-	-	-	1856
ST MARY'S ISLAND *Goldcrest Drive*	0853	1053	-	-	-	1858

St Mary's Island - Chatham - Medway Valley Park - Cuxton - Halling Snodland - West Mailing — BUS 151

Sundays - also Bank, National & Public Holidays. Not 25/26 December

Bus Operator	N-V	N-V	N-V	N-V	N-V	N-V
Service number	151	151	151	151	151	151
ST MARY'S ISLAND *Goldcrest Drive*	0853	1053	-	-	-	1859
CHATHAM MARITIME *opp Ship & Trades*	0856	1056	-	-	-	1902
CHATHAM *Waterfront Bus Station A5*	0900	1100	1300	1500	1700	1906
Chatham Rail Stn *Bus Stop A*	0902	1102	1302	1502	1702	1908
opp Rochester Railway Station	0906	1106	1306	1506	1706	1912
Strood Town Centre *opp Canal Road*	0908	1108	1308	1508	1708	1914
STROOD Morrisons	0911	1111	1311	1511	1711	1917
Medway Valley Park	0917	1117	1317	1517	1717	-
CUXTON *A228 White Hart*	0923	1123	1323	1523	1723	1925
A228 St Andrews Park	0925	1125	1325	1525	1725	1927
Halling Station	0927	1127	1327	1527	1727	1929
Halling Church	0928	1128	1328	1528	1728	1930
Halling *Howlsmere Close*	0929	1129	1329	1529	1729	1931
SNODLAND *opp The Bull*	0934	1134	1334	1534	1734	1936
St Benedict Road	0936	1136	1336	1536	1736	-
HAM HILL *Freemasons Arms*	0941	1141	1341	1541	1741	1939
Leybourne *opp Church*	0945	1145	1345	1545	1745	-
West Malling Station*	0951*	1151*	1351*	1551	1751	-
WEST MALLING *High St TESCO**	0953*	1153*	1353*	1553	1753	-

IMPORTANT NOTE:

Generally on the 4th Sunday of each month, a Farmers Market takes place in West Malling High Street On such occasions, journeys shown* terminate/restart at A20 Town Hill, and do NOT serve West Malling High Street/Station.

Medway Valley Links

Have a single, return or season ticket for the Medway Valley Line?

You can use this on bus 151 between Strood and Snodland at anytime; just show your ticket to the driver.

Bus journeys do not qualify for Southeastern Delay Repay Scheme.

Kent County Council
Public Transport
PO Box 441
Aylesford
Kent ME6 9HJ
public.transport@kent.gov.uk

Medway Council
Integrated Transport
Gun Wharf
Dock Road
Chatham
Kent ME4 4TR
www.medway.gov.uk/buses
customer.first@medway.gov.uk

for bus fares & running information

Nu-Venture
Unit 2F
Deacon Trading Estate
Forstal Road
Aylesford
Kent ME20 7SP
01622 882288
www.nu-venture.co.uk

traveline
public transport info

www.traveline.info
0871 200 22 33
calls from landlines cost 10p per minute

652 St Marys Island - Cuxton - Strood Academy

ASD Coaches

The information on this timetable is expected to be valid until at least 29th March 2017. Where we know of variations, before or after this date, then we show these at the top of each affected column in the table.

Direction of stops: where shown (eg: W-bound) this is the compass direction towards which the bus is pointing when it stops

Mondays to Fridays

Service Restrictions	**1**
Notes	**SDO**
St Mary's Island, adj Haven Way	**0738**
Wainscott, adj The Walk	**0746**
Strood, St Mary's Road (Stop C)	**0753**
Strood, Matalan (Stop F)	**0755**
Cuxton, opp Scout Hut	**0805**
Medway Valley Park, opp Ballard Business Park	**0810**
Strood, o/s Strood Academy	**0815**

Saturdays

no service

Sundays

no service

Service Restrictions: **1** - to 21.7.17, not 3.4.17 to 13.4., 30.5. to 2.6.

Notes: **SDO** - Schooldays only

652 Strood Academy - St Marys Island - Cuxton

ASD Coaches

The information on this timetable is expected to be valid until at least 29th March 2017. Where we know of variations, before or after this date, then we show these at the top of each affected column in the table.

Direction of stops: where shown (eg: W-bound) this is the compass direction towards which the bus is pointing when it stops

Mondays to Fridays

Service Restrictions	**1**
Notes	**SDO**
Strood, o/s Strood Academy	**1515**
Wainscott, opp The Walk	**1524**
St Mary's Island, adj Haven Way	**1532**
Medway City Estate, Neptune Business Park (S-bound)	**1536**
Strood, opp Railway Station	**1540**
Strood, Canal Road (Stop E)	**1542**
Strood, Matalan (Stop F)	**1543**
Medway Valley Park, adj Ballard Business Park	**1546**
Cuxton, adj Scout Hut	**1551**

Saturdays

no service

Sundays

no service

Service Restrictions: **1** - to 21.7.17, not 3.4.17 to 13.4., 30.5. to 2.6.

Notes: **SDO** - Schooldays only

652 St Marys Island - Cuxton - Strood Academy

ASD Coaches

For times of the next departures from a particular stop you can use **traveline-txt** - by sending the SMS code to **84268**. Add the service number after the code if you just want a specific service - eg: **buctdgtd 60**. The return message from **traveline-txt** will show the next three departures, and it currently costs 25p plus any message sending charge. Departure times will be real-time predictions where available, or scheduled departure times if not.

You can also get the same information by using the SMS code at www.nextbuses.mobi (only normal browsing charges apply) or through several iPhone or Android apps that offer access to **NextBuses**.

NOTE: SMS codes are different in each direction. Make sure you choose the right direction from these lists.

SMS Code	Stop Name	Street	ATCO Code
chadmgw	St Mary's Island, adj Haven Way	Island Way East	249000000126
chadmgj	Chatham Maritime, opp Ship and Trades	Maritime Way	249000000122
chadwaj	Wainscott, opp Post Office	Wainscott Road	249000000290
chadwam	Wainscott, adj The Walk	Wainscott Road	249000000291
chamjaw	Wainscott, opp Higham Road	Hollywood Lane	2490105995
chajpdw	Wainscott, opp Greenfields Close	Hollywood Lane	249000000932
chamjap	Wainscott, adj Jarrett Avenue	Hollywood Lane	2490105991
chamjaj	Wainscott, Hollywood Lane Middle (W-bound)	Hollywood Lane	2490105987
chajmgw	Frindsbury, adj Cooling Road	Hollywood Lane	249000000870
chadtpw	Frindsbury, opp Lower Rochester Road	Brompton Farm Road	249000000280
chadtpm	Frindsbury, Cliffe Road Top (S-bound)	Cliffe Road	249000000278
chadwdp	Frindsbury, opp King Arthur's Drive	Cliffe Road	249000000299
chamgta	Frindsbury, opp Clarendon Drive	Cliffe Road	2490101163
chadwdg	Frindsbury, opp Slatin Road	Cliffe Road	249000000296
chadjad	Strood, St Mary's Road (Stop C)	North Street	249000000054
chadgam	Strood, Matalan (Stop F)	Commercial Road	249000000007
chamamp	Strood, adj Morrisons	Priory Road	249099325
chajmjp	Strood, Priory Road (NW-bound)	Priory Road	249000000876
chadgap	Strood, Darnley Arch (S-bound)	Cuxton Road	249000000008
chadmjd	Strood, opp Hawthorn Road	Cuxton Road	249000000128
chadmjg	Strood, opp Poplar Road	Cuxton Road	249000000129
chadmjt	Medway Valley Park, adj Ballard Business Park	Cuxton Road	249000000132
chamjgt	Sundridge Hill, opp Ranscombe Farm	Sundridge Hill	2490101177
chajmjw	Sundridge Hill, opp Pilgrims Way	Sundridge Hill	249000000879
chajtpa	Cuxton, Sundridge Hill Bottom (SW-bound)	Sundridge Hill	249096565
chadmpj	Cuxton, adj White Hart	Sundridge Hill	249000000137
chadmpw	Cuxton, opp Scout Hut	Bush Road	249000000140
chajpmg	Cuxton, Sundridge Hill Bottom (NE-bound)	Sundridge Hill	249000000967
chajmjt	Sundridge Hill, adj Pilgrims Way	Sundridge Hill	249000000878
chamjgp	Sundridge Hill, adj Ranscombe Farm	Rochester Road	2490101176
chadmjp	Medway Valley Park, opp Ballard Business Park	Cuxton Road	249000000131
chadmjm	Strood, adj Poplar Road	Cuxton Road	249000000130
chadmja	Strood, adj Hawthorn Road	Cuxton Road	249000000127
chadgat	Strood, Darnley Arch (N-bound)	Cuxton Road	249000000009
chadgwm	Strood, adj Downside	London Road	249000000051
chadgwj	Strood, o/s Sports Centre	Watling Street	249000000050
chadgwa	Earl Estate, opp Chapter Road	Watling Street	249000000047
chadgtp	Earl Estate, adj Lancelot Avenue	Watling Street	249000000045
chamgwj	Earl Estate, Salters Cross (W-bound)	Watling Street	2490105969
chadgtm	Earl Estate, adj Carnation Road	Watling Street	249000000044
chajwdp	Strood, o/s Strood Academy	Watling Street	2490103130

652 Strood Academy - St Marys Island - Cuxton

ASD Coaches

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NOTE: SMS codes are different in each direction. Make sure you choose the right direction from these lists.

SMS Code	Stop Name	Street	ATCO Code
chajwdp	Strood, o/s Strood Academy	Watling Street	2490103130
kntjmptw	Strood, opp Old Watling Street	Watling Street	2400104007
kntadatj	Strood, adj Old Watling Street	Watling Street	240075026
chadpdp	Earl Estate, opp Linwood Avenue	Rede Court Road	249000000172
chadpdt	Frindsbury, adj Burleigh Close	Rede Court Road	249000000173
chadpga	Frindsbury, adj Strood Fire Station	Rede Court Road	249000000175
chajwda	Frindsbury, adj Harlech Close	Brompton Farm Road	2490103003
chamgwm	Frindsbury, opp Farm Hill Avenue	Brompton Farm Road	2490105977
chadtpd	Frindsbury, opp Hyperion Drive	Brompton Farm Road	249000000275
chadtpj	Frindsbury, opp Lynette Avenue	Brompton Farm Road	249000000277
chamgwt	Frindsbury, adj Stonehorse Lane	Brompton Farm Road	2490105981
chajmta	Frindsbury, adj Lower Rochester Road	Brompton Farm Road	249000000890
chamdmd	Wainscott, opp Povey Avenue	Hollywood Lane	2490101118
chamjag	Wainscott, Hollywood Lane Middle (E-bound)	Hollywood Lane	2490105985
chamjam	Wainscott, opp Jarrett Avenue	Hollywood Lane	2490105989
chajpga	Wainscott, adj Greenfields Close	Hollywood Lane	249000000933
chamjat	Wainscott, adj Higham Road	Hollywood Lane	2490105993
chadwap	Wainscott, opp The Walk	Wainscott Road	249000000292
chadwag	Wainscott, adj Post Office	Wainscott Road	249000000289
chadmgm	Chatham Maritime, adj Ship and Trades	Maritime Way	249000000123
chadmgw	St Mary's Island, adj Haven Way	Island Way East	249000000126
chadmgj	Chatham Maritime, opp Ship and Trades	Maritime Way	249000000122
chajdam	Medway City Estate, opp Enterprise Close	Anthony Way	249000000749
chajdaj	Medway City Estate, opp Chaucer Close	Anthony Way	249000000748
chajdad	Medway City Estate, Neptune Business Park (S-bound)	Anthony Way	249000000746
chamapj	Medway City Estate, adj Whitewall Way	Whitewall Road	2490101095
chamapd	Medway City Estate, adj Cliffe Construction	Whitewall Road	2490101091
chamamw	Strood, opp Whitewall Road	Commissioners Road	2490101090
chamadm	Strood, Wingrove Drive (SW-bound)	Wingrove Drive	2490101054
chamdap	Strood, opp Railway Station	Canal Road	2490101050
chadawp	Strood, Canal Road (Stop E)	High Street	249000000002
chadgam	Strood, Matalan (Stop F)	Commercial Road	249000000007
chamamp	Strood, adj Morrisons	Priory Road	249099325
chajmjp	Strood, Priory Road (NW-bound)	Priory Road	249000000876
chadgap	Strood, Darnley Arch (S-bound)	Cuxton Road	249000000008
chadmjd	Strood, opp Hawthorn Road	Cuxton Road	249000000128
chadmjg	Strood, opp Poplar Road	Cuxton Road	249000000129
chadmjt	Medway Valley Park, adj Ballard Business Park	Cuxton Road	249000000132
chamjgt	Sundridge Hill, opp Ranscombe Farm	Sundridge Hill	2490101177
chajmjw	Sundridge Hill, opp Pilgrims Way	Sundridge Hill	249000000879
chajtpa	Cuxton, Sundridge Hill Bottom (SW-bound)	Sundridge Hill	249096565
chadmpt	Cuxton, adj Scout Hut	Bush Road	249000000139

653 Halling - Cuxton - Cookham Wood Schools - Huntsman Corner

Arriva Kent & Surrey

The information on this timetable is expected to be valid until at least 29th March 2017. Where we know of variations, before or after this date, then we show these at the top of each affected column in the table.

Direction of stops: where shown (eg: W-bound) this is the compass direction towards which the bus is pointing when it stops

Mondays to Fridays

Service Restrictions		1
Notes		SDO
Halling, opp Marsh Road		0657
Upper Halling, at Browndens Road		0710
Cuxton, opp White Hart		0721
Cuxton, opp Whiteleaves Rise		0727
Strood, Canal Road (Stop D)		0743
Rochester, o/s Grammar Schools	arr	0753
Rochester, o/s Grammar Schools	dep	0756
Warren Wood, o/s Primary Academy		0800
Chatham, Huntsmans Corner (N-bound)		0805

Saturdays

no service

Sundays

no service

Service Restrictions: **1** - to 21.7.17, not 3.4.17 to 13.4., 30.5. to 2.6.

Notes: **SDO** - Schooldays only

653 Rochester & Chatham Grammar Schools - Cuxton - Halling

Arriva Kent & Surrey

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Direction of stops: where shown (eg: W-bound) this is the compass direction towards which the bus is pointing when it stops

Mondays to Fridays

Service Restrictions	**1**
Notes	**SDO**
Rochester, o/s Grammar Schools	**1525**
Warren Wood, o/s Primary Academy	**1530**
Chatham, Huntsmans Corner (N-bound)	**1537**
Chatham, Chatham Railway Station (Stop B)	**1542**
Rochester, Star Hill (Stop K)	**1546**
Strood, Canal Road (Stop E)	**1555**
Cuxton, opp Whiteleaves Rise	**1611**
Cuxton, opp Scout Hut	**1614**
Upper Halling, at Browndens Road	**1624**
Halling, adj Marsh Road	**1635**

Saturdays

no service

Sundays

no service

Service Restrictions: **1** - to 21.7.17, not 3.4.17 to 13.4., 30.5. to 2.6.

Notes: **SDO** - Schooldays only

653 Halling - Cuxton - Cookham Wood Schools - Huntsman Corner

Arriva Kent & Surrey

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NOTE: SMS codes are different in each direction. Make sure you choose the right direction from these lists.

SMS Code	Stop Name	Street	ATCO Code
chamgdw	Halling, opp Marsh Road	Low Meadow	2490101140
chadpag	Halling, opp The Five Bells	High Street	249000000156
chadpap	Halling, opp Britannia Close	High Street	249000000159
chadpat	Halling, adj Howlsmere Close	High Street	249000000160
chadmwp	North Halling, adj Jade Hill	Kent Road	249000000153
chadpda	Halling, adj Fire Station	Vicarage Road	249000000162
chajpjp	Halling, o/s 19 Vicarage Road	Vicarage Road	249000000945
chadpdj	Upper Halling, at Browndens Road	Browndens Road	249000000169
chadpdg	Upper Halling, adj Pilgrims Road	Vicarage Road	249000000168
chadmwm	North Halling, opp Jade Hill	Kent Road	249000000152
chadmwj	North Halling, St Andrews Park (N-bound)	Formby Road	249000000151
chadmwd	North Halling, opp Cuxton Marina	Formby Road	249000000149
chamamj	North Halling, adj Pilgrims Way	Rochester Road	2490102808
chamdgp	Cuxton, o/s St Michael's Church	Rochester Road	2490101037
chadmpm	Cuxton, opp White Hart	Rochester Road	249000000138
chadmpt	Cuxton, adj Scout Hut	Bush Road	249000000139
chadmta	Cuxton, o/s 26 James Road	James Road	249000000141
chamjta	Cuxton, opp Reginald Avenue	Charles Drive	2490101174
chadmtd	Cuxton, opp Whiteleaves Rise	Charles Drive	249000000142
chadmtg	Cuxton, opp Nine Acres Road	Charles Drive	249000000143
chadmtj	Cuxton, o/s 111 Charles Drive	Charles Drive	249000000144
chadmtm	Cuxton, opp Junior School	Bush Road	249000000145
chadmpw	Cuxton, opp Scout Hut	Bush Road	249000000140
chajpmg	Cuxton, Sundridge Hill Bottom (NE-bound)	Sundridge Hill	249000000967
chajmjt	Sundridge Hill, adj Pilgrims Way	Sundridge Hill	249000000878
chamjgp	Sundridge Hill, adj Ranscombe Farm	Rochester Road	2490101176
chadmjp	Medway Valley Park, opp Ballard Business Park	Cuxton Road	249000000131
chadmjm	Strood, adj Poplar Road	Cuxton Road	249000000130
chadmja	Strood, adj Hawthorn Road	Cuxton Road	249000000127
chadgat	Strood, Darnley Arch (N-bound)	Cuxton Road	249000000009
chadgag	Strood, St Nicholas Church (Stop A)	High Street	249000000005
chadawt	Strood, Canal Road (Stop D)	High Street	249000000003
chagamg	Rochester, Rochester Guildhall Museum (Stop A)	Corporation Street	249000000360
chagamp	Rochester, Railway Station (Stop D)	Corporation Street	249000000362
chagamt	Rochester, Rochester Community Hub (Stop C)	Corporation Street	249000000363
chagadw	Rochester, East Row (Stop L)	East Row	249000000343
chagagj	Rochester, opp Watts Avenue	Maidstone Road	249000000346
chagaga	Rochester, adj Longley Road	Maidstone Road	249000000344
chagajg	Rochester, adj St Margaret's Cemetery	Maidstone Road	249000000353
chajmdj	Rochester, adj Warden Road	Maidstone Road	249000000859
chadwjd	Rochester, opp Priestfields	Maidstone Road	249000000310
chadwjg	Rochester, o/s Grammar Schools	Maidstone Road	249000000311
chadwgj	Rochester, opp Hawser Road	The Tideway	249000000304
chadwpt	Warren Wood, o/s Primary Academy	Arethusa Road	249000000328
chagwmj	Rochester, opp Cloisterham Road	City Way	249000000673
chagwmg	Rochester, opp Jiniwin Road	City Way	249000000672
chagwmp	Rochester, Horsted Way (NE-bound)	Horsted Way	249000000674
chagwmw	Chatham, opp The Ridgeway	Horsted Way	249000000676
chagwpa	Chatham, adj Wallace Road	Maidstone Road	249000000677
chajajg	Chatham, Huntsmans Corner (N-bound)	Maidstone Road	249000000712

653 Rochester & Chatham Grammar Schools - Cuxton - Halling

Arriva Kent & Surrey

For times of the next departures from a particular stop you can use **traveline-txt** - by sending the SMS code to **84268**. Add the service number after the code if you just want a specific service - eg: **buctdgtd 60**. The return message from **traveline-txt** will show the next three departures, and it currently costs 25p plus any message sending charge. Departure times will be real-time predictions where available, or scheduled departure times if not.

You can also get the same information by using the SMS code at www.nextbuses.mobi (only normal browsing charges apply) or through several iPhone or Android apps that offer access to **NextBuses**.

NOTE: SMS codes are different in each direction. Make sure you choose the right direction from these lists.

SMS Code	Stop Name	Street	ATCO Code
chadwjg	Rochester, o/s Grammar Schools	Maidstone Road	249000000311
chadwgj	Rochester, opp Hawser Road	The Tideway	249000000304
chadwpt	Warren Wood, o/s Primary Academy	Arethusa Road	249000000328
chagwmj	Rochester, opp Cloisterham Road	City Way	249000000673
chagwmg	Rochester, opp Jiniwin Road	City Way	249000000672
chagwmp	Rochester, Horsted Way (NE-bound)	Horsted Way	249000000674
chagwmw	Chatham, opp The Ridgeway	Horsted Way	249000000676
chagwpa	Chatham, adj Wallace Road	Maidstone Road	249000000677
chajajg	Chatham, Huntsmans Corner (N-bound)	Maidstone Road	249000000712
chajajd	Chatham, opp Letchworth Avenue	Maidstone Road	249000000711
chajagw	Chatham, opp Football Ground	Maidstone Road	249000000709
chajagt	Chatham, opp Cemetery	Maidstone Road	249000000708
chajagj	Chatham, adj Gladstone Road	Maidstone Road	249000000705
chajagd	Chatham, opp Westmount Avenue	Maidstone Road	249000000704
chadamj	Chatham, Chatham Railway Station (Stop B)	Chatham bus/rail interchange	249000000700
chagwgd	Chatham, opp St Bart's Hospital	New Road	249000000655
chagwdw	Rochester, adj Jacksons Fields	New Road	249000000653
chagapa	Rochester, Star Hill (Stop K)	Star Hill	249000000365
chagamw	Rochester, Rochester Community Hub (Stop N)	Corporation Street	249000000364
champap	Rochester, Railway Station (Stop E)	Corporation Street	2490101195
chagamj	Rochester, Rochester Guildhall Museum (Stop P)	Corporation Street	249000000361
chadawp	Strood, Canal Road (Stop E)	High Street	249000000002
chadgam	Strood, Matalan (Stop F)	Commercial Road	249000000007
chamamp	Strood, adj Morrisons	Priory Road	249099325
chajmjp	Strood, Priory Road (NW-bound)	Priory Road	249000000876
chadgap	Strood, Darnley Arch (S-bound)	Cuxton Road	249000000008
chadmjd	Strood, opp Hawthorn Road	Cuxton Road	249000000128
chadmjg	Strood, opp Poplar Road	Cuxton Road	249000000129
chadmjt	Medway Valley Park, adj Ballard Business Park	Cuxton Road	249000000132
chamjgt	Sundridge Hill, opp Ranscombe Farm	Sundridge Hill	2490101177
chajmjw	Sundridge Hill, opp Pilgrims Way	Sundridge Hill	249000000879
chajtpa	Cuxton, Sundridge Hill Bottom (SW-bound)	Sundridge Hill	249096565
chadmpj	Cuxton, adj White Hart	Sundridge Hill	249000000137
chadmpt	Cuxton, adj Scout Hut	Bush Road	249000000139
chadmta	Cuxton, o/s 26 James Road	James Road	249000000141
chamjta	Cuxton, opp Reginald Avenue	Charles Drive	2490101174
chadmtd	Cuxton, opp Whiteleaves Rise	Charles Drive	249000000142
chadmtg	Cuxton, opp Nine Acres Road	Charles Drive	249000000143
chadmtj	Cuxton, o/s 111 Charles Drive	Charles Drive	249000000144
chadmtm	Cuxton, opp Junior School	Bush Road	249000000145
chadmpw	Cuxton, opp Scout Hut	Bush Road	249000000140
chadmtp	Cuxton, opp St Michael's Church	Rochester Road	249000000146
chadmtw	North Halling, opp Pilgrims Way	Rochester Road	249000000147
chadmwa	North Halling, adj Cuxton Marina	Formby Road	249000000148
chadmwg	North Halling, St Andrews Park (S-bound)	Formby Road	249000000150
chadmwp	North Halling, adj Jade Hill	Kent Road	249000000153
chadpda	Halling, adj Fire Station	Vicarage Road	249000000162
chajpjp	Halling, o/s 19 Vicarage Road	Vicarage Road	249000000945
chadpdj	Upper Halling, at Browndens Road	Browndens Road	249000000169
chadpdg	Upper Halling, adj Pilgrims Road	Vicarage Road	249000000168
chadmwm	North Halling, opp Jade Hill	Kent Road	249000000152
chadpaw	Halling, opp Howlsmere Close	High Street	249000000161
chadpam	Halling, adj Britannia Close	High Street	249000000158
chadpaj	Halling, adj The Five Bells	High Street	249000000157
chamgdt	Halling, adj Marsh Road	Low Meadow	2490101139

Route 703: Maidstone-Allington-Larkfield-Lunsford Park-Snodland-Halling-Cuxton-Bluewater

Wednesdays

Maidstone, Chequers Bus Station (Stop H2)	09:45
Maidstone West, Railway Station	09:50
Allington, Allington Way	09:55
Aylesford, Retail Park	09:59
Larkfield, Wealden Hall	10:04
Lunsford Park, Tesco (Chaucer Way)	10:11
Ham Hill, Freemasons Arms	10:14
Snodland, Midsummer Road	10:17
Snodland, Bull	10:19
Halling, Five Bells	10:23
Cuxton, White Hart	10:27
Bluewater, Bus Station	10:45

Code	SDO	NSD
Bluewater, Bus Station (Bay 8)	13:30	15:30
Cuxton, White Hart	13:48	15:48
Halling, Five Bells	13:52	15:52
Snodland, Bull	13:56	15:56
Snodland, Midsummer Road	13:58	15:58
Ham Hill, Freemasons Arms	14:01	16:01
Lunsford Park, Tesco (Chaucer Way)	14:04	16:04
Larkfield, Wealden Hall	14:11	16:11
Aylesford, Retail Park	14:16	16:16
Allington, Allington Way	14:20	16:20
Maidstone West, Rocky Hill	14:25	16:25
Maidstone, Chequers Bus Station	14:30	16:30

Notes

SDO = This journey operates on Schooldays Only

NSD = This journey operates on Non-Schooldays Only

↓* = This journey operates direct via the M20 & the A228 between the Coldharbour Roundabout & Ham Hill

↓# = This journey operates direct via the full length of Malling Road

NO SERVICE ON PUBLIC HOLIDAYS OR OTHER DAYS OF THE WEEK

Saturdays

valid from 16th January 2016

Maidstone, Chequers Bus Station (Stop H2)	09:30	12:30
Maidstone West, Railway Station	09:35	12:35
Allington, Allington Way	09:40	12:40
Aylesford, Retail Park	09:44	↓*
Larkfield, Wealden Hall	09:49	↓*
Lunsford Park, Tesco (Chaucer Way)	09:56	↓*
Ham Hill, Freemasons Arms	09:59	12:51
Snodland, Midsummer Road	10:02	↓#
Snodland, Bull	10:04	12:54
Halling, Five Bells	10:08	12:58
Cuxton, White Hart	10:12	13:02
Bluewater, Bus Station	10:30	13:20

Bluewater, Bus Station (Bay 8)	14:00	17:00
Cuxton, White Hart	14:18	17:18
Halling, Five Bells	14:22	17:22
Snodland, Bull	14:26	17:26
Snodland, Midsummer Road	↓#	17:28
Ham Hill, Freemasons Arms	14:29	17:31
Lunsford Park, Tesco (Chaucer Way)	↓*	17:34
Larkfield, Wealden Hall	↓*	17:41
Aylesford, Retail Park	↓*	17:46
Allington, Allington Way	14:40	17:50
Maidstone West, Rocky Hill	14:45	17:55
Maidstone, Chequers Bus Station	14:50	18:00

County Connect

- 01732 445 004
- connect-buses.co.uk
- info@connect-buses.co.uk

Bus times Commencing – 5th September 2016

Route E	Strood & Cuxton to Snodland

Morning:

Watling Street, Strood Academy	08:02
Bligh Way shops	08:05
Darnley Road shops	08:11
Cuxton, Sundridge Hill	08:15
Halling, junction A228	08:20
Snodland, Holmesdale school	08:30

Afternoon:

Snodland, Holmesdale school	15:25
Halling, junction A228	15:32
Cuxton, Sundridge Hill	15:36
Darnley Road shops	15:39
Bligh Way shops	15:43
Watling Street, Strood Academy	15:46

Fares

To Holmesdale from:	*Single*	*Return*	*Autumn term*	*Spring term*	*Summer term*
Strood	£2.70	£3.80	£233	£189	£189
Cuxton onwards	£2.20	£3.20	£186	£151	£151

Passes accepted:
Kent Young Person's Travel Pass for journeys within Kent or starting/finishing in Kent
English National Concession Travel Pass (afternoon trip only)

Unit E, Port Werburgh, Vicarage Lane, Hoo, Rochester, Kent. ME3 9LB
Tel: 01634 254000
info@farleighcoaches.com www.farleighcoaches.com

APPENDIX 4

Preliminary Ecological Appraisal
(KB Ecology, March 2017)

Land South of Sundridge Hill, Cuxton, Kent

Preliminary Ecological Appraisal

17th March 2017 / Ref No 2016/11/06

Client: Mr S Gill

Prepared by Katia Bresso CEnv MCIEEM
Trading as 'KB Ecology Ltd' (Reg 7595382)
42, Douglas Road
Lenham, Kent
ME17 2QP
[redacted]

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1 Introduction

1.1 Background to the Scheme

KB Ecology Ltd has been commissioned to undertake a baseline ecological survey and a preliminary ecological appraisal with regards to a proposed development at Land South of Sundridge Hill, Cuxton, Kent, ME2 1LF, to support representations in response to Medway Council's Local Plan 2012 - 2035 Development Options Consultation Document.

The extent of site to be surveyed is shown on the map below, as sent by the client:

1.2 Survey Location/Area

The site is located at approximately TQ 714 670. The location of the site is shown on Figure 1 and Figure 2.

1.3 Survey Objectives

The purpose of this survey is to provide a scoping assessment and to assist in demonstrating compliance with wildlife legislation and planning policy objectives.

The key objectives are as follows:

- Identify all relevant statutory and non-statutory designated sites and features of ecological significance within the site and its surroundings.
- Assess the potential for the presence of protected species and species of principal conservation importance, important habitats or other biodiversity features within the site and its surroundings.
- Provide recommendations for further surveys where assessed as necessary and suggest potential enhancements.
- Present the likely significance of ecological impacts on the proposed development.
- Provide an early indication of potential ecological mitigation and compensation requirements necessary as part of any development proposals.

A summary of wildlife legislation and policy has been included in Appendix A.

1.4 Limitations

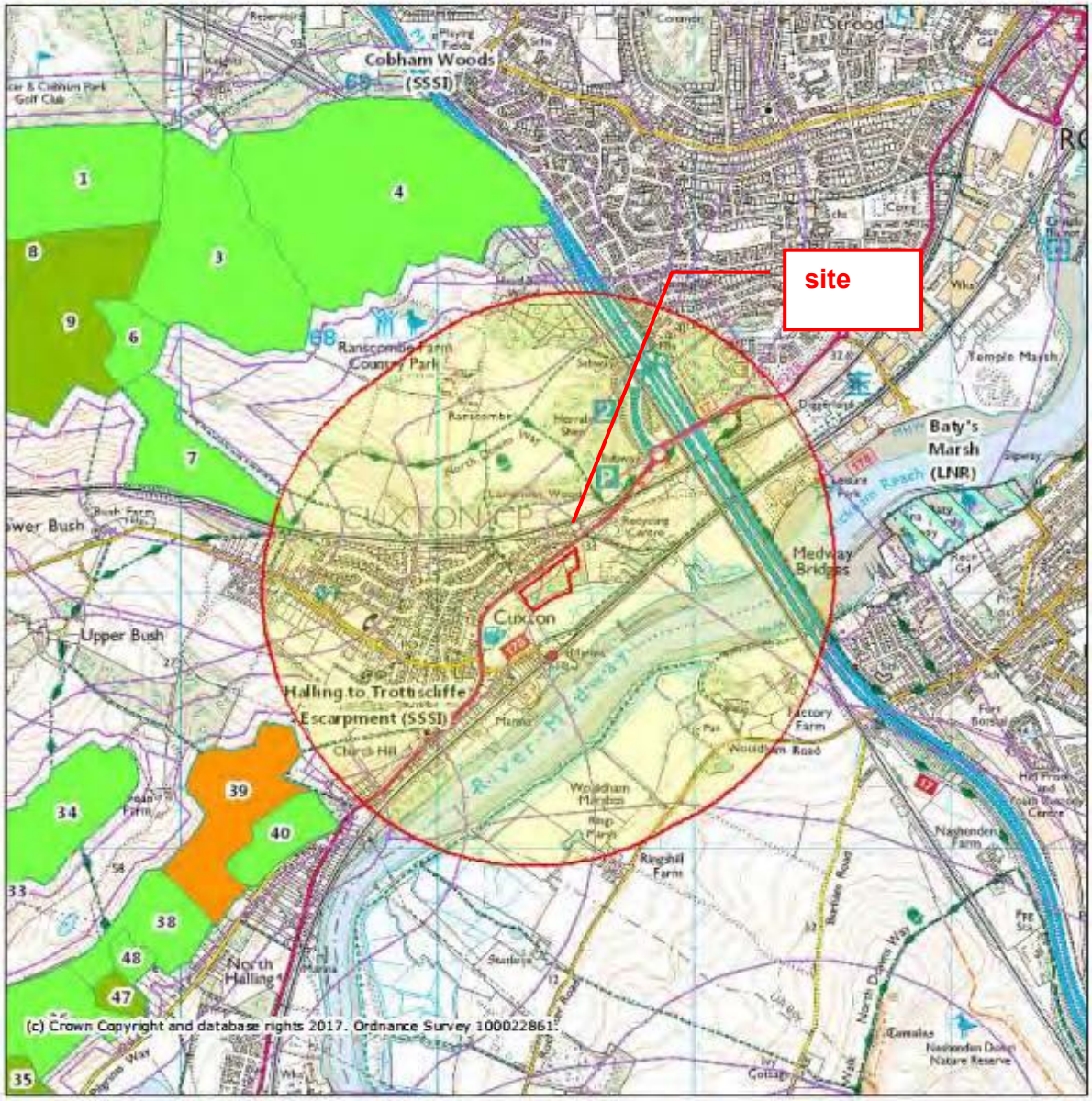
This report aims to provide general advice on ecological constraints associated with any development of the site and includes recommendations for further survey; it is not intended that this report should be submitted with a planning application for development of the site, unless supported by the results of further surveys and a detailed assessment of the effects of the proposed development.

This report has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management‘s Code of Professional Conduct and the opinions expressed are true and professional bona fide opinions. It records the potential for flora and fauna evident on the days of the site visits. It does not record any flora or fauna that may appear at other times of the year and, as such, were not evident at the time of visit.

The findings of this report represent the professional opinion of a qualified ecologist and do not constitute professional legal advice. The client may wish to seek professional legal interpretation of the relevant wildlife legislation cited in this document.

MAGIC

Figure 1

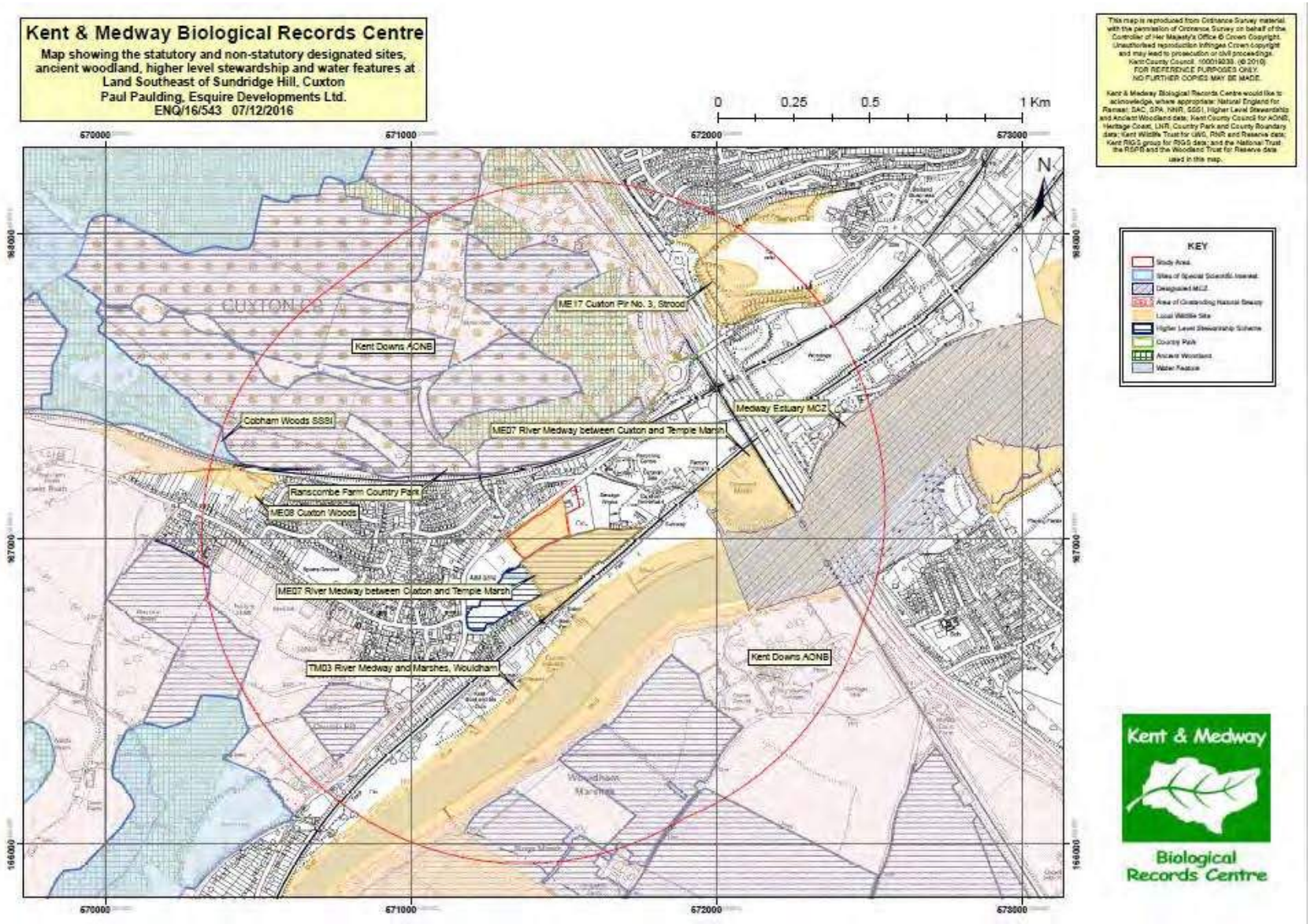


Legend

- Limestone Pavement Orders (England)
- Local Nature Reserves (England)
- Moorland Line (England)
- National Nature Reserves (England)
- National Nature Reserves (Scotland)
- National Nature Reserves (Wales)
- National Parks (England)
- Ramsar Sites (England)
- Ramsar Sites (Scotland)

Projection = OSGB36
xmin = 567800
ymin = 164600
xmax = 575100
ymax = 169700

Map produced by MAGIC on 13 March, 2017.
Copyright resides with the data suppliers and the map must not be reproduced without their permission. Some information in MAGIC is a snapshot of the information that is being maintained or continually updated by the originating organisation. Please refer to the metadata for details as information may be illustrative or representative rather than definitive at this stage.

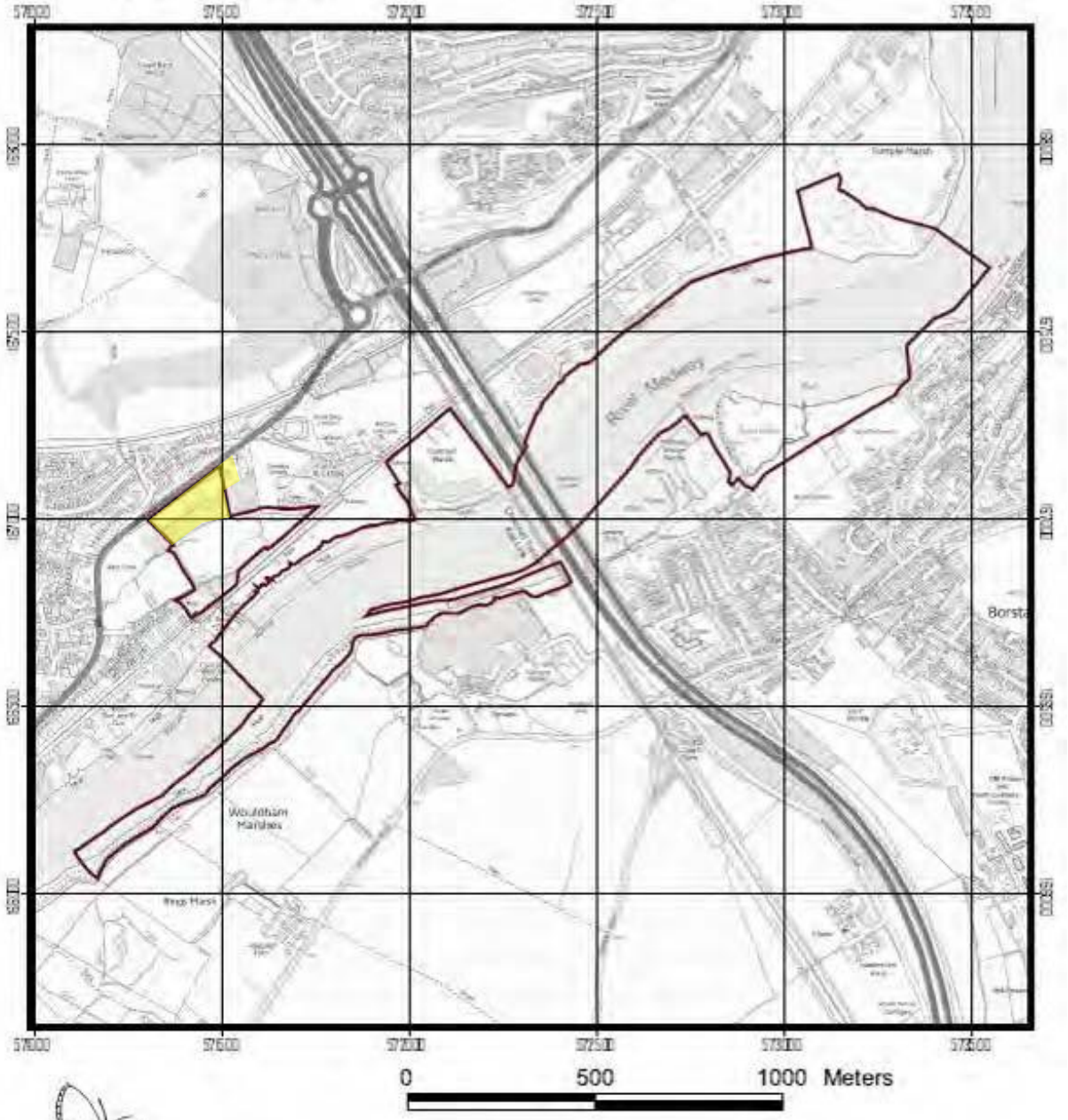

Kent & Medway Biological Records Centre
Map showing the statutory and non-statutory designated sites, ancient woodland, higher level stewardship and water features at Land Southeast of Sundridge Hill, Cuxton
Paul Paulding, Esquire Developments Ltd.
ENQ/16/543 07/12/2016
0 0.25 0.5 1 Km
670000
671000
672000
673000
N
KEY
Study Area
Sites of Special Scientific Interest
Designated MCZ
Area of Outstanding Natural Beauty
Local Wildlife Site
Higher Level Stewardship Scheme
Country Park
Ancient Woodland
Water Feature
ME17 Cuxton Pit No. 3, Strood
Kent Downs AONB
Medway Estuary MCZ
Cobham Woods SSSI
ME07 River Medway between Cuxton and Temple Marsh
Ranscombe Farm Country Park
ME08 Cuxton Woods
ME07 River Medway between Cuxton and Temple Marsh
TM03 River Medway and Marshes, Wouldham
Kent Downs AONB
Kent & Medway
Biological Records Centre

KENT LOCAL WILDLIFE SITE

Site Ref No: **ME07**

Site: RIVER MEDWAY BETWEEN CUXTON AND TEMPLE MARSH

Map ref: TQ 725671



Kent Wildlife Trust © 2014

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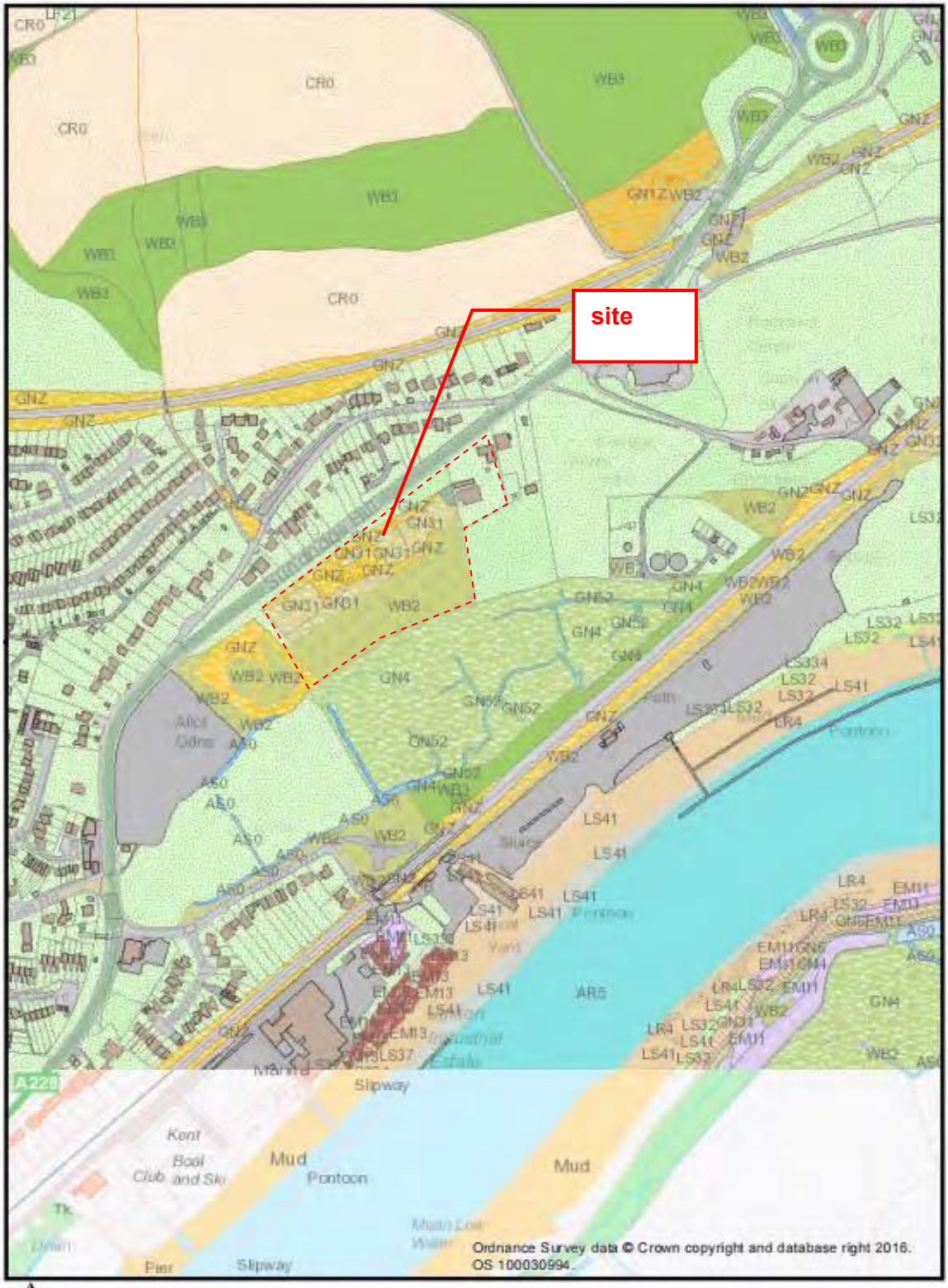
FIGURE 2



Scale 1:5,000 ©Crown copyright and database rights Ordnance Survey 100024298 Map Dated: 13 Mar 2017

Figure 3: indicates location of ponds from KRAG data search

2 Methodology

2.1 Desk Study

Internet-based resources were consulted to identify designated nature conservation sites within 1km of the site and habitats of potentially high ecological importance and sensitivity within 500m of the site (e.g. ancient woodlands, ponds).

A data search was carried out with the Kent and Medway Biological Record Centre KMBRC[1].

2.2 Scoping Survey

The site and its immediate surroundings were considered in terms of habitats, protected species and species of principal conservation importance during a walkover survey undertaken on 1st December 2016 by Katia Bresso CEnv MCIEEM, a qualified professional consultant ecologist with over 15 years of experience[2], licensed bat surveyor (Class Survey Licence Registration Number 2015-11917-CLS-CLS (CL15 Bat Roost Visitor Level 1), 2015-11918-CLS-CLS (CL18 Bat Survey Level 2) and 2016-27133-CLS-CLS (WML-A34 - Level 3 Class Licence) and Registered Consultant of the Bat Low Impact Class Licence WML-CL21 with Natural England (since May 2015), licensed dormouse surveyor (Class Survey Licences Registration Number 2016-22060-CLS-CLS) and licensed great crested newt surveyor (Class Survey Licences Registration Number Level 1 2015-16268-CLS-CLS and Class Survey Licences Registration Number Level 2 2016-23313-SCI-SCI). Evidence of the use of the site by species was recorded (i.e. field signs).

The habitat survey was undertaken in general accordance with Phase 1 Habitat Survey (JNCC 2010), i.e. within the survey area every parcel of land is classified, recorded and mapped in accordance with a list of ninety specified habitat types using standard colour codes to allow rapid visual assessment of the extent and distribution of different habitat types.

The survey and report aim at following the guidance and recommendations in the ‗British Standard Biodiversity Code of Practice for Planning and Development (BS 42020: 2013)'.

The buildings were not accessed internally but they were checked and assessed for bat roosting potential externally.

2.3 Bats in trees assessment

The survey entailed a preliminary ground level roost assessment, i.e. an external inspection of all trees present within the survey area, looking at potential to support bats and looking for actual signs of bats, using an endoscope, high powered torch and binoculars where needed (from the ground only).

The features of trees that can be used as bat roosts include:

- Natural holes, woodpecker holes, rot cavities that orient upwards from the entrance,
- Cracks/splits in major limbs

[1] Please note that absence of records should not be taken as confirmation that a species is absent from the search area.

[2] Katia Bresso is a Suitably Qualified Ecologist with regards to Code for Sustainable Homes assessment and BREEAM

- Loose bark
- Behind dense, thick-stemmed ivy
- Hollows/cavities
- Within dense epicormic growth
- Bird and bat boxes

Each tree was classified as follows:

Suitability	Description Roosting habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions[a] and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation[b]). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.[c]
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions[a] and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions[a] and surrounding habitat.

No climbing inspections of trees and no emergence or dawn surveys were undertaken as part of this work.

3 Baseline Ecological Conditions

3.1 Designated Nature Conservation Sites

The site is not part of, nor directly adjacent to, any statutory designated sites. Two Sites of Special Scientific Interest (SSSI) are present near-by:

- Cobham Woods SSSI, present 900m to the North:
  This woodland and old parkland is representative of woods in North Kent which occur in part on acidic Thanet Sands and in part on chalk soils. One nationally rare plant species occurs in the arable land close to the wood. An outstanding assemblage of plants is present at this site which is also of importance for its breeding birds.
- Halling to Trottiscliffe Escarpment SSSI, present 1.05km to the West:
  This site consists of an extensive area of the North Downs west of the ‗Medway Gap'. The site is representative of Chalk grassland in west Kent and beech woodland on the chalk. Outstanding assemblages of plants and invertebrates are present.

The site is not identified in the Medway Adopted Local Plan (2003) as a Local Wildlife Site. However, the KMBRC data search indicates that the site forms part of a local wildlife site: ‗ME07 River Medway between Cuxton and Temple Marsh'. Local Wildlife Sites (LWSs) are identified and selected for their local nature conservation value. LWSs protect threatened species and habitats acting as buffers, stepping stones and corridors between nationally-designated wildlife sites[3]. The citation (see appendix A) does not specifically mention the site itself, other than stating: *'Chalk scrub on the slope above the low-lying pasture, dominated by hawthorn, dogwood and wayfaring tree, adds diversity to the site'*. The area at Sundridge Hill was added to the LWS at the 2001 revision.

3.2 Habitats

The site is surrounded by grazing marsh to the South, a small wood to the West, residential areas to the North and a refuse tip to the East.

The Integrated Habitat System (IHS) classification in the Kent Habitat Survey 2012 describes the site as:

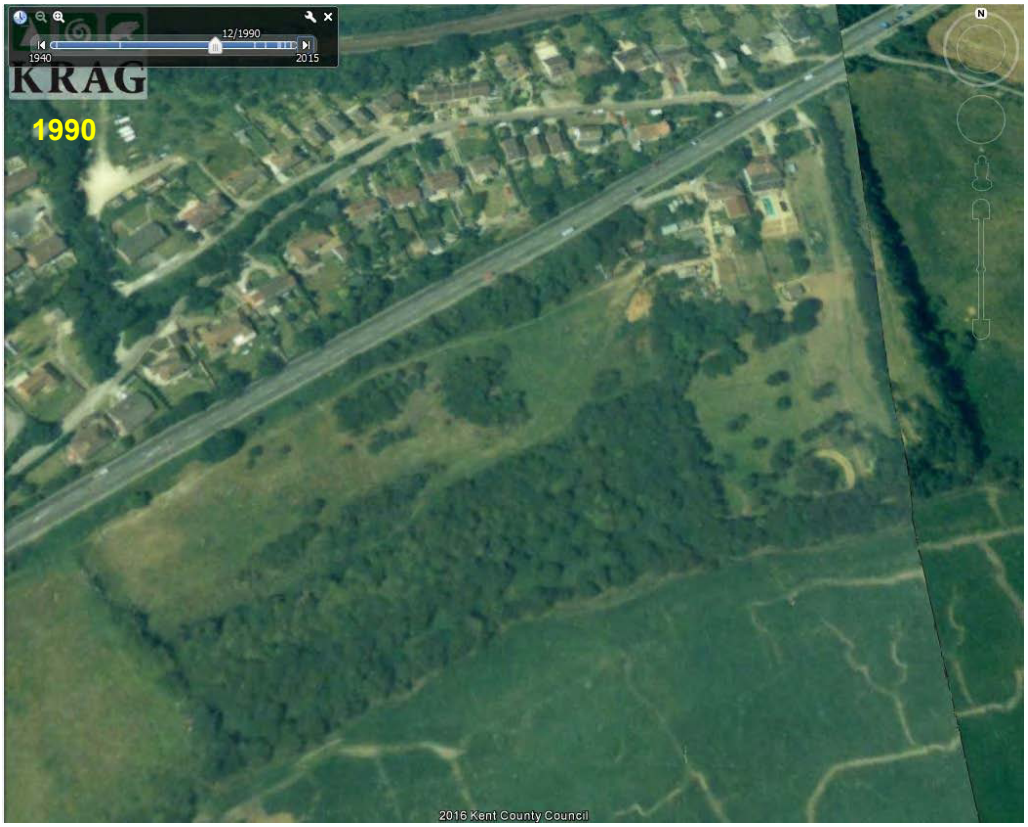
- *GNZ - Semi-improved neutral grassland*
- *GN31 - Coarse neutral grassland*
- *WB2 - Scrub woodland*

However, historical aerial maps show that the main part of the site away from the buildings was a single field in the 1940's to 1960's, then the bottom half was scrubbed over in 1990 and 2003 but the scrub was cleared circa 2007 and kept under control to the present day.

[3] In Kent, there are over 460 Local Wildlife Sites, covering a total area of over 27,500 hectares, (roughly 7% of the county). They range from a 0.13 hectares churchyard important for its orchids, to grazing marsh sites of over 1,000 hectares.

KRAG
1940

KRAG
1960



At the time of site visit, the site consisted of an access drive with dwelling and outbuildings, a small vegetable patch and a large field to the West, surrounded by a line of trees along the

East, South and West boundaries and a road embankment covered in scrub along the North boundary. Horses are said to graze there occasionally.

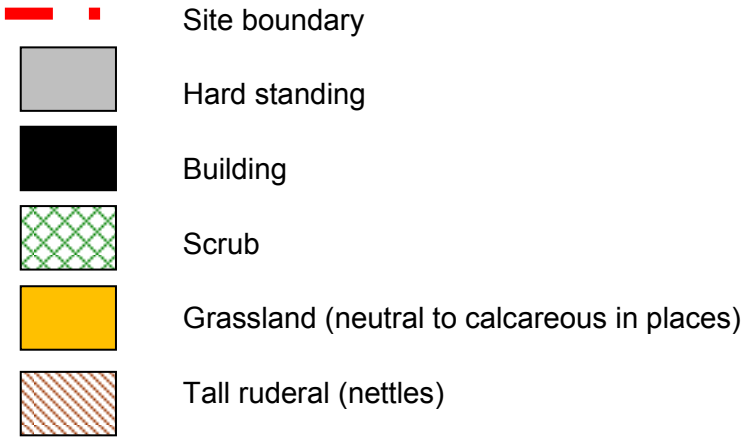
The trees present included ash *Fraxinus excelsior*, blackthorn *Prunus spinosa*, hawthorn *Crataegus monogyna*, butterfly bush *Buddleja davidii,* elder *Sambucus nigra*, cherry *Prunus sp*, silver birch *Betula pendula*, wayfaring-tree Viburnum lantana and *rosa sp.* Stands of dogwood *Cornus sanguinea* and traveller's joy *Clematis vitalba* were present too.

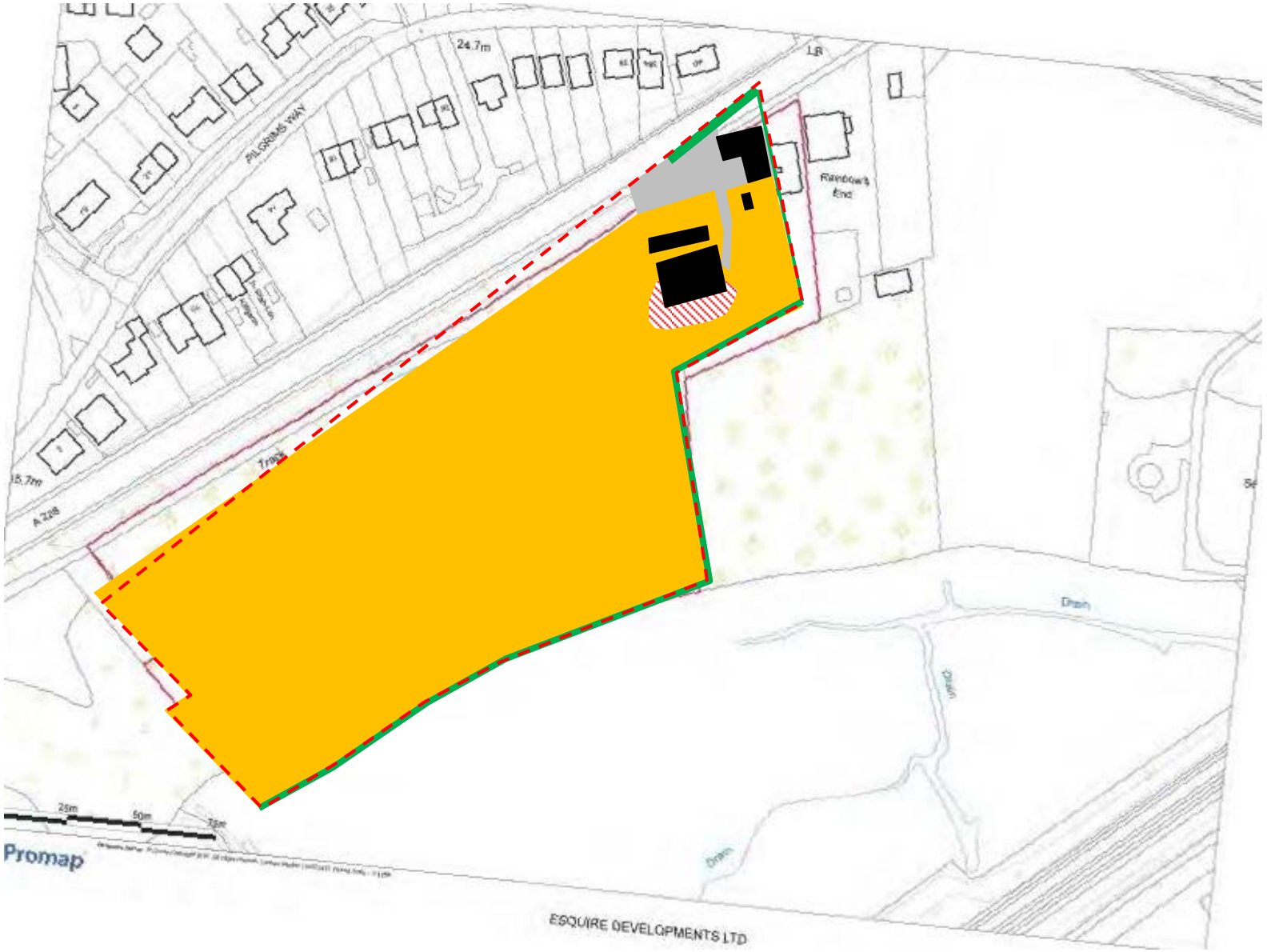
The field comprised the following species at the time of site visit: bramble *Rubus fruticosus agg*, bristly oxtongue *Picris echioides*, common nettles *Urtica dioica*, lesser burdock *Arctium minus,* ground ivy *Glechoma hederacea*, alexanders *Smyrnium olusatrum,* mallow *Malva sp,* great mullein *Verbascum Thapsus,* common ragwort *Senecio jacobaea*, teasel *Dipsacus fullonum*, ribwort plantain *Plantago lanceolata*, creeping cinquefoil *Potentilla reptans*, dock *Rumex sp*. Some areas also had perforate St John's wort *Hypericum perforatum*, weld *Reseda luteola* and marjoram *Origanum vulgare*, indicating a chalk character to the site.

Large stands of nettles were present as were piles of brash and rubble.

Plates are present in Appendix B. Figure 4 below shows the location of the habitats.

Legend of Phase 1 habitat survey map hereafter:




24.7m
PILGRIMS WAY
Rainbows End
A228
Drain
Promap
ESQUIRE DEVELOPMENTS LTD

3.3 Amphibians

The data search carried out with the Kent Reptile and Amphibian Group (Enquiry No: CES/16/482) revealed that the closest recorded Great Crested Newt *Triturus cristatus* site is a historical record located at Cuxton Pit, 1 km to the NE (record id: 682).

Great crested newts favour areas of high pond density and occupancy levels can exceed 40% of ponds when conditions are favourable. There are only three ponds within 1km of the site, as per KRAG's pond database. Its risk assessment indicates that the likelihood of presence of great crested newts *in the overall area* is *'Possible'* [4].

No ponds were present on site or within 100m, with the nearest pond being 245m to the South (aerial photos suggest that this pond has been dry for a number of years), the next nearest pond being a swimming pool at Cuxton School and the third being on the other side of the river Medway.

[4] Likelihood of Presence Scores are described using the following categories: Unlikely<Possible<Likely<High

Due to the distance to the nearest pond and very low number of ponds in the area, it is judged unlikely that great crested newts would be present on site. However other amphibians such as frogs may be present

Common amphibian species are afforded limited legal protection under the Wildlife & Countryside Act 1981 (as amended). The great crested newt is afforded full legal protection under Schedule 5 of the Wildlife & Countryside Act 1981 (as amended). It is also listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2010 and are therefore a European Protected Species (EPS). Great crested newts and common toads are also listed as species of principal conservation importance (See Appendix A).

For more information, guidance from Natural England is available at
https://www.gov.uk/great-crested-newts-protection-surveys-and-licences

3.4 Reptiles

The KRAG datasearch revealed that the closest recorded reptile is Slow-worm, located at Ranscombe Farm, 0.32 km to the N (record id: 66009). The likelihood of reptiles to be present in the overall area is judged as per table below:

Reptiles

	Likelihood of Presence	
	Score	Dist (km)
Viviparous Lizard:	Likely	0.80
Slow-worm:	HIGH	0.32
Sand Lizard:	*unlikely*	*63.90*
Grass Snake:	HIGH	0.67
Adder:	Possible	3.36
Smooth Snake:	n/a	n/a

Reptile survey effort in local area is considered to be relatively high.

The site offers good potential habitat for reptiles, being mainly unmanaged with areas of scrub, on a south facing slope.

Common reptiles are afforded limited legal protection under Schedule 5 of the Wildlife & Countryside Act 1981 (as amended). They are also listed as species of principal conservation importance (See Appendix A).

For more information, guidance from Natural England is available at
https://www.gov.uk/reptiles-protection-surveys-and-licences

3.5 Birds

The KMBRC data search did not hold any bird records from within the site itself.

It is considered that the site has high potential to support breeding birds within the hedges and scrub. Ground nesting birds such as skylark could be present in the field. No signs of barn owl *Tyto alba* were found during the expernal/internal survey of the outbuildings. No white droppings, black/grey pellets or white/buff feathers (specific signs of barn owls) were found.

All species of bird whilst actively nesting are afforded legal protection under the Wildlife & Countryside Act 1981 (as amended) and special penalties are available for offences related to birds listed on Schedule 1. Some species are also listed as species of principal conservation importance, including sky lark, common cuckoo, house sparrow, tree sparrow and song thrush (See Appendix A).

For more information, guidance from Natural England is available at
https://www.gov.uk/wild-birds-protection-surveys-and-licences

3.6 Hazel Dormouse

It is considered that the site has no potential to support the hazel dormouse *Muscardinus avellanarius* due to lack of connection to suitable woodlands (the KMBRC data search indicates that they are known to be present in Merrals shaw wood but this wood is on the other side of the busy A228, thus disconnected from the site).

3.7 Badger

The KMBRC data search did not hold any badger records from within the site itself.

A number of excavations are present along the line of trees along the South boundary, including a number of rabbit burrows. During the initial site visit, it was not possible to assess whether these/some were badger setts. No other signs of badgers (such as latrines) were found.

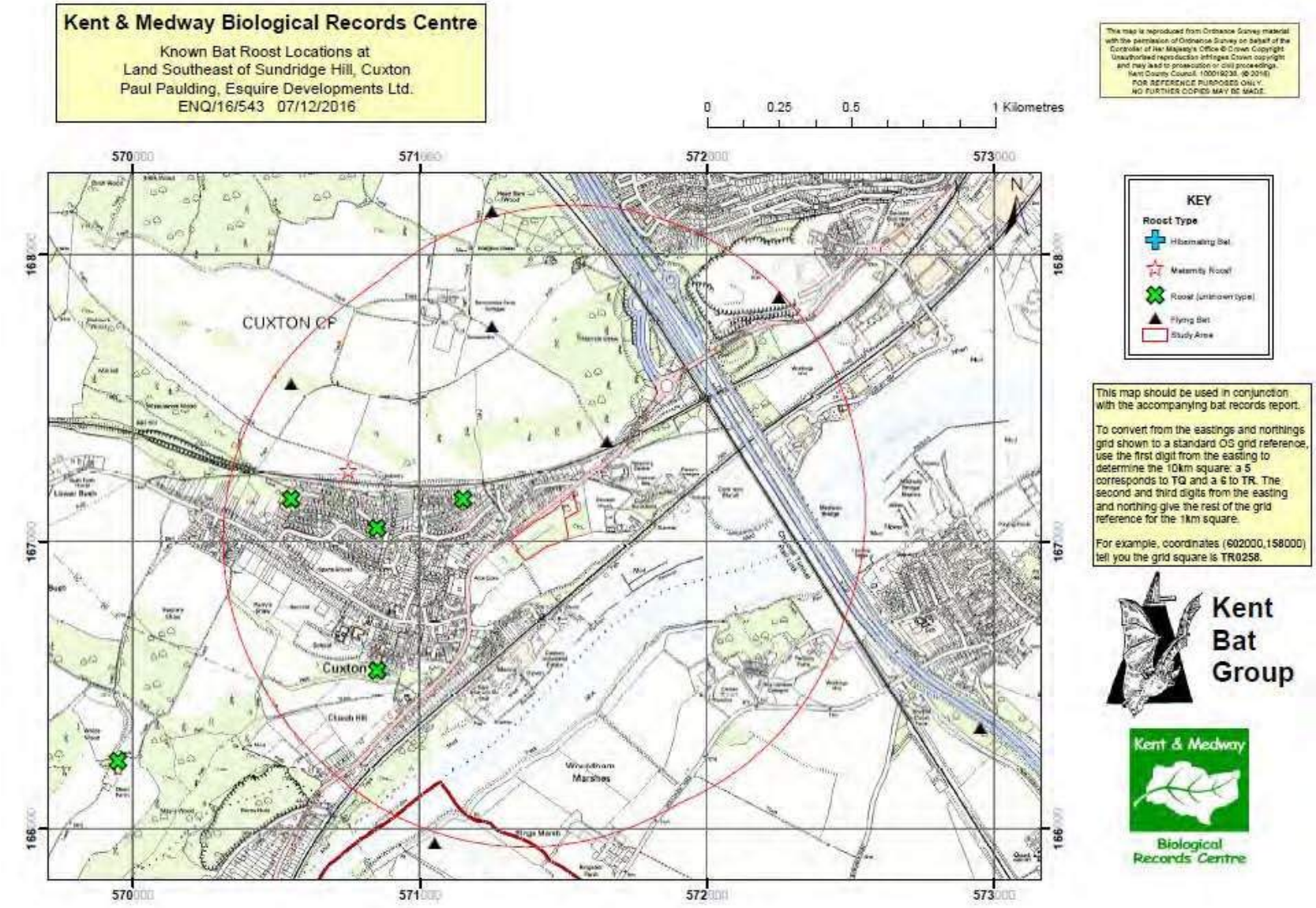
The Protection of Badgers Act 1992 was introduced in recognition of the additional threats that badgers face from illegal badger digging and baiting. Under the Act, it is an offence inter alia to:

- Wilfully kill, injure or take a badger, or to attempt to do so;
- Cruelly ill-treat a badger; or
- Intentionally or recklessly interfere with a badger sett by (a) damaging a sett or any part of one; (b) destroying a sett; (c) obstructing access to or any entrance of a sett; (d) causing a dog to enter a sett; or (e) disturbing a badger when it is occupying a sett.

For more information, guidance from Natural England is available at
https://www.gov.uk/badgers-protection-surveys-and-licences

3.8 Bats

The KMBRC data search indicated that ten species of bat, of the 15 species recorded in Kent, have been recorded in this area, but no records within the site itself.


Kent & Medway Biological Records Centre
Known Bat Roost Locations at
Land Southeast of Sundridge Hill, Cuxton
Paul Paulding, Esquire Developments Ltd.
ENQ/16/543 07/12/2016
0 0.25 0.5 1 Kilometres
This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Office © Crown Copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Kent County Council. 100019238. (© 2016)
FOR REFERENCE PURPOSES ONLY.
NO FURTHER COPIES MAY BE MADE.
570000
571000
572000
573000
168000
167000
166000
N
CUXTON CP
Cuxton
Church Hill
Wouldham Marshes
KEY
Roost Type
Hibernating Bat
Maternity Roost
Roost (unknown type)
Flying Bat
Study Area
This map should be used in conjunction with the accompanying bat records report.
To convert from the eastings and northings grid shown to a standard OS grid reference, use the first digit from the easting to determine the 10km square: a 5 corresponds to TQ and a 6 to TR. The second and third digits from the easting and northing give the rest of the grid reference for the 1km square.
For example, coordinates (602000,158000) tell you the grid square is TR0258.
Kent Bat Group
Kent & Medway
Biological Records Centre

No bats nor signs of bats were found during the internal/external inspection of the buildings inspected. The dwelling was not inspected internally but its concrete interlocking tiles show some gaps which could be used by crevice dwelling bats. One of the outbuildings is a timber structure with a roof made of wood planks over felt which could be used by crevice dwelling bats too. The larger outbuilding was judged as offering negligible potential for roosting bats, having a single skin corrugated roof over a metal structure.

None of the trees present on site offered potential for roosting bats. But the site is likely to be used by foraging and commuting bats.

Table 4.1 Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement.

Suitability	Description Roosting habitats	Commuting and foraging habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions[a] and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation[b]). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.[c]	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions[a] and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions[a] and surrounding habitat.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

[a] For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.
[b] Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten *et al.*, 2015). This phenomenon requires some research in the UK but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in large buildings in highly urbanised environments.
[c] This system of categorisation aligns with BS 8596:2015 Surveying for bats in trees and woodland (BSI, 2015).

Table from Bat Conservation Trust (2012). Bat Surveys - Good Practice Guidelines – 2nd Edition. Bat Conservation Trust, London.

All species of bat are afforded full legal protection under Schedule 5 of the Wildlife & Countryside Act 1981 (as amended). They are also listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2010 and are therefore a ~~E~~European Protected Species" (EPS). Some species of bats (noctule, soprano pipistrelle, brown long-eared bat, barbastelle) are also listed as species of principal conservation importance.

Bats rarely use the same roosting place all year round as they need different conditions for breeding and hibernating. But bats are creatures of habit and tend to return to the same sites at the same time year after year. For this reason, roosts are legally protected even if bats don‘t seem to be living there at certain times of year.

The legislation makes it a criminal offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat;
- Intentionally or recklessly obstruct access to a bat roost.

For more information, guidance from Natural England is available at https://www.gov.uk/bats-protection-surveys-and-licences

3.9 Other Species

It is considered that the site has potential to support hedgehogs (*Erinaceus europaeus*), which are a Species of Principal Importance under Section 41 of the NERC Act (2008 updated list).

Common mammal species such as rabbit (*Oryctolagus cuniculus*), mole (*Talpa europea*), field vole (*Microtus agrestis*) and fox (*Vulpes vulpes*) are likely to be present on site.

All mammals are afforded protection against unnecessary suffering by the Wild Mammals (Protection) Act 1996 (see Appendix A).

4 Ecological constraints and opportunities, recommendations for mitigation, compensation and further survey

The details of the proposed development were not known at the time of writing this report.

Should the scope of the proposed works be amended following the completion of this scoping survey, or be deferred for an extended period of time, there may be a requirement to update this scoping report and its recommendations.

4.1 Designated Nature Conservation Sites

A site check report was generated for the site using the Impact Risk Zones on the Magic website[5]:

13/03/2017

Site Check Report Report generated on Mon Mar 13 2017
You selected the location: Centroid Grid Ref: TQ713670
The following features have been found in your search area:

SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)

1. DOES PLANNING PROPOSAL FALL INTO ONE OR MORE OF THE CATEGORIES BELOW?	2. IF YES, CHECK THE CORRESPONDING DESCRIPTION(S) BELOW. LPA SHOULD CONSULT NATURAL ENGLAND ON LIKELY RISKS FROM THE FOLLOWING:
All Planning Applications	
Infrastructure	Airports, heliports and other aviation proposals.
Wind & Solar Energy	Wind turbines
Minerals, Oil & Gas	
Rural Non Residential	
Residential	
Rural Residential	
Air Pollution	Any industrial/agricultural development that could cause AIR POLLUTION (incl. industrial processes, pig & poultry units, slurry lagoons > 500m² & manure stores > 250t).
Combustion	General combustion processes >20MW energy input, incl. energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/ combustion.
Waste	Landfill, incl. inert landfill, non-hazardous landfill, hazardous landfill.
Composting	Any composting proposal with more than 500 tonnes maximum annual operational throughput incl. open windrow composting, in-vessel composting, anaerobic digestion, other waste management.
Discharges	Any discharge of water or liquid waste that is more than 20m³/day. The water needs to either be discharged to ground (ie to seep away) or to surface water, such as a beck or stream. Discharges to mains sewer are excluded.
Water Supply	
GUIDANCE - How to use the Impact Risk Zones	Magic_for_Impact%20IRZ User Guidance MAGIC.pdf

The type of development proposed is not listed as being a category for which the LPA should consult Natural England. The proposal is not judged detrimental to the near-by protected sites.

[5] The Impact Risk Zones (IRZs) dataset is a GIS tool which maps zones around each SSSI according to the particular sensitivities of the features for which it is notified and specifies the types of development that have the potential to have adverse impacts.

Natural England uses the IRZs to make an initial assessment of the likely risk of impacts on SSSIs and to quickly determine which consultations are unlikely to pose risks and which require more detailed consideration. Publishing the IRZs will allow LPAs, developers and other partners to make use of this key evidence tool.

http://www.naturalengland.org.uk/ourwork/planningdevelopment/impactriskzonesgistoolfeature.aspx

4.2 Habitats

It is recommended to carry out a botanical survey. This should follow the National Vegetation Classification method (NVC)[6], informed by quadrat sample data, and giving descriptions of the vegetation types present and their relative importance to confirm their extent and value to assess whether the development of the site can be mitigated appropriately, and help identify areas of key plant interest in order that they could be avoided.

Habitats present outside the works footprint should be suitably protected against any damages during works. Trees to be retained should be protected during any construction work and guidance is given in the BS 5837:2012 Trees in relation to design, demolition and construction. Recommendations' document. This standard requires a tree protection plan to be developed which involves erecting physical barriers to prevent damage to existing trees, with an exclusion area around the trees. It also looks at defining a root protection area and requires consideration when compulsory work is carried out within the root protection area.

It is recommended that a minimum of a 5 metre wide buffer zone alongside the South boundary remains free from built development including lighting, domestic gardens and formal landscaping.

4.3 Amphibians

There are a number of development activities which can affect great crested newts, which should be fully considered at the application stage. Great crested newts can migrate more than 500 metres from their breeding ponds in areas of suitable terrestrial habitat. However, generally the scale of potential impacts will decrease as the distance from the breeding pond increases. Impacts on great crested newts could include:

	If GCN are present, would it be the case for this project?	
Habitat loss	Both the loss of breeding ponds and terrestrial habitat can have significant impacts upon great crested newts since newts live on land for the majority of their lives. Populations can be reduced or even go extinct where there is a major loss of habitat due to reduced foraging, breeding and refuge opportunities. Consequently, the mitigation strategy must ensure that there is no net loss of habitat (be it breeding ponds or terrestrial habitat) for newts.	**No**
Habitat modification	Although some development may not replace newt habitat with built land, it can be made less suitable. For example, changing an area of rough grassland used by newts as terrestrial habitat into amenity grassland could have a negative impact on the population. Therefore the mitigation strategy should ensure that there is no net loss in quantity and quality of habitat.	**No**
Habitat fragmentation and isolation	Habitat fragmentation and isolation of great crested newt populations can be caused when development imposes barriers to newt dispersal. These barriers can include built land, fast flowing water bodies or extreme landforms. Isolation of great crested newts can result in population number declines	**No**

[6] the botanical survey should take place between April and September, this will require several site visit throughout the flowering season

	If GCN are present, would it be the case for this project?	
	and a decrease in genetic viability. Therefore the mitigation strategy should include measures to maintain habitat linkages and preferably reconnect fragmented areas.	
Miscellaneous	Other more indirect impacts caused by development also need to be fully considered, such as increased shading and siltation of ponds, water table alteration and potential for increased chemical run-off into waterbodies. Great crested newts can also be impacted by interference following a development, such as the introduction of fish to breeding ponds which will predate the young life stages of newts.	**No**

Although it is known that great crested newts can disperse up to 500 metres through suitable terrestrial habitat from their breeding pond, it is widely accepted that they tend to utilise suitable terrestrial habitat within a much closer distance. Activity is usually concentrated within 100 metres of breeding ponds and key habitat is located within 50 metres (termed by Natural England as core habitat).

In a document published by English Nature in 2004, it is stated that, regarding great crested newts, *the most comprehensive mitigation, in relation to avoiding disturbance, killing or injury is appropriate within 50m of a breeding pond. It will also almost always be necessary to actively capture newts 50-100m away. However, at distances greater than 100m, there should be careful consideration as to whether attempts to capture newts are necessary or the most effective option to avoid incidental mortality. At distances greater than 200-250m, capture operations will hardly ever be appropriate.*

A number of ponds are present within 500m of the proposed development site. Although no surveys have been undertaken of these ponds, it is judged highly unlikely that any great crested newts be present on site and therefore no further survey work or mitigation works are proposed with regards to this species.

4.4 Reptiles

Although no further surveys are considered necessary to support the promotion of the Site for allocation within the Local Plan, specific reptile surveys are recommended to support any future application, looking at presence/absence and, if present, population size.

The survey would consist of placing artificial refuges (i.e. 0.5 m^2 tins or roofing felt) in areas of suitable reptile habitat and leaving them in place for at least 1 week prior to the survey commencing. The refuges would be checked on seven separate occasions, over four weeks at least, to establish presence / likely absence during suitable weather conditions (i.e. cool weather with no heavy rain but sunny intervals between showers, and ambient air temperatures between 10-20^{o}C). Should reptiles be recorded during the presence / absence survey, further visits may be recommended to establish relative population size. In addition, log piles, rock piles and building debris can also be searched under for the presence of reptiles.

Reptile surveys can be undertaken between March and October, the optimal months being April, May, June and September. Mid-summer temperatures and general activity levels are usually too high for refuges to be successfully used (surveys are highly weather dependent).

Should the presence of reptiles be confirmed through further surveys, mitigation may involve the installation of reptile exclusion fencing, and the trapping and translocation of reptiles during suitable weather conditions. Captured animals should be released into a receptor habitat made suitable beforehand. Such animal translocation exercises should only take place once planning permission has been granted.

Mitigation may also require the enhancement, replacement or creation of additional reptile habitats. These works may be necessary in advance and/or after the construction works.

4.5 Birds

As the site is part of LWS ME07 River Medway between Cuxton and Temple Marsh which is said to be important for wintering birds and nightingale and where warblers, green woodpecker, yellow wagtail, turtle dove and kingfisher are probable breeding species, breeding bird surveys are recommended: they are best conducted with a methodology based on the BTO Breeding Bird Survey (BBS), for which the site would be visited on a minimum of four occasions, each visit commencing at dawn, to record the numbers and species present.

4.6 Hazel Dormouse

No further work is recommended with regards to dormice.

4.7 Badger

Although no further surveys are considered necessary to support the promotion of the Site for allocation within the Local Plan, specific surveys of the holes present along the southern boundary are recommended to support any future application, to confirm whether they are used by badgers and to what extent. Indeed, badger tunnels can extend to 20m from the entrance holes and are located between 0.2 and several metres deep, depending on the soil and topography. Excavation work and heavy machinery should be kept well away from where it could result in damage to the sett or disturbance to any badger occupying the sett. Also an assessment of the loss of foraging habitat should be done, should badgers indeed be present.

4.8 Bats

Although no further surveys are considered necessary to support the promotion of the Site for allocation within the Local Plan, specific bat surveys are recommended to support any future application.

The Bat Conservation Trust‘s guidelines provide a table stating the minimum number of presence/absence survey visits required to provide confidence in negative preliminary roost assessment from buildings, built structures and trees in summer.

Table 7.3 Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).

Low roost suitability	Moderate roost suitability	High roost suitability
One survey visit. One dusk emergence or dawn re-entry survey[a] (structures). No further surveys required (trees).	Two separate survey visits. One dusk emergence and a separate dawn re-entry survey.[b]	Three separate survey visits. At least one dusk emergence and a separate dawn re-entry survey. The third visit could be either dusk or dawn.[b]

[a] Structures that have been categorised as low potential can be problematic and the number of surveys required should be judged on a case-by-case basis (see Section 5.2.9). If there is a possibility that quiet calling, late-emerging species are present then a dawn survey may be more appropriate, providing weather conditions are suitable. In some cases, more than one survey may be needed, particularly where there are several buildings in this category.

[b] Multiple survey visits should be spread out to sample as much of the recommended survey period (see Table 7.1) as possible; it is recommended that surveys are spaced at least two weeks apart, preferably more. A dawn survey immediately after a dusk one is considered only one visit.

Table 7.1 Recommended timings for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).

Low roost suitability	Moderate roost suitability	High roost suitability
May to August (structures) No further surveys required (trees)	May to September[a] with at least one of surveys between May and August[b]	May to September[a] with at least two of surveys between May and August[b]

It is therefore recommended that one night-time survey is undertaken between May and August for the dwelling and outbuilding.

The vegetation of the site is likely to be used by foraging and commuting bats. The Bat Conservation Trust's guidelines provide a table stating the number of bat activity surveys recommended to achieve a reasonable survey effort in relation to habitat suitability.

Table 8.3 Guidelines on the number of bat activity surveys recommended to achieve a reasonable survey effort in relation to habitat suitability.

Survey type	Low suitability habitat for bats[a]	Moderate suitability habitat for bats	High suitability habitat for bats
Transect/spot count/timed search surveys	One survey visit[b] per season (spring – April/May, summer – June/July/August, autumn – September/October)[c] in appropriate weather conditions for bats Further surveys may be required if these survey visits reveal higher levels of bat activity than predicted by habitat alone	One survey visit[b] per month (April to October)[c] in appropriate weather conditions for bats. At least one of the surveys should comprise dusk and pre-dawn (or dusk to dawn) within one 24-hour period.	Up to two survey visits[b] per month (April to October)[c] in appropriate weather conditions for bats. At least one of the surveys should comprise dusk and pre-dawn (or dusk to dawn) within one 24-hour period.
AND			
Automated/static bat detector surveys[d]	One location per transect, data to be collected on five consecutive nights per season (spring – April/May, summer – June/July/August, autumn – September/October)[c] in appropriate weather conditions for bats	Two locations per transect, data to be collected on five consecutive nights per month (April to October)[c] in appropriate weather conditions for bats	Three locations per transect, data to be collected on five consecutive nights per month (April to October)[c] in appropriate weather conditions for bats

It is therefore recommended to carry out three bat activity surveys and static detector survey (two detectors), as per above.

Besides, as lighting can be detrimental to roosting, foraging and commuting bats[7], the recommendations from the Bat Conservation Trust, titled Bats and Lighting in the UK, should be considered, when designing any lighting scheme for the proposed development (see Appendix C).

4.9 Other Species

No further surveys are considered necessary to support the promotion of the Site for allocation within the Local Plan.

4.10 Additional Recommendations: Enhancements

Ecological enhancements should where possible be incorporated into the proposed development to contribute towards the objectives of planning legislation below:
On 27 March 2012, the UK Government published the National Planning Policy Framework (NPPF) which states that ~~-o~~pportunities to incorporate biodiversity in and around developments should be encouraged ~~-(~~Para 118).

The design and implementation of habitat enhancements could also be used to contribute towards the ‗Home Quality Mark' or similar accreditation, should this be a consideration for this site.

The site is present within the ‗Medway Gap & North Kent Downs‗ Biodiversity Opportunity Area (BOA). The BOA maps can be seen as a spatial reflection of the Kent Biodiversity Action Plan. The BOA statement documents will provide guidance on the conservation priorities which should be adopted in each area.

The Targets of the Medway Gap & North Kent Downs BOA are:
1 Maintain and enhance existing and recently created chalk grassland. Enhance at least 40ha of chalk grassland to bring it to UK BAP priority habitat quality. Pursue opportunities for:
• Additional chalk grassland creation where this would contribute to the county-wide target of 232ha by 2020; and
• Additional chalk grassland restoration to meet the county-wide target of 464ha by 2020.
2 Enhance or reinstate woodland management, and restore plantations on ancient woodland sites to native woodland; extend and reconnect fragmented woodlands where this would not conflict with grassland conservation and enhancement
3 Pursue opportunities for the restoration and enhancement of grazing marsh, fen and reedbed habitats within the floodplain of the River Medway, including restoration of at least 50ha of grazing marsh in the Medway Valley between Rochester and New Hythe, to contribute to county-wide targets of 500ha.
4 Secure and maintain appropriate management of key brownfield sites, particularly where these support UK BAP priority species .
5 Continue to conserve and enhance key populations of arable weeds, and maintain, enhance and extend the area of cereal field margins being positively managed for arable weeds.
6 Pursue opportunities for creation of species-rich neutral grassland where this would contribute to the county-wide target of creating 37ha on new lowland meadow in blocks of at least 2ha by 2020. Enhance at least 15ha of species-rich neutral grassland to bring it to UK BAP priority habitat Lowland Meadow quality.

[7] http://www.bats.org.uk/pages/bats_and_lighting.html and http://www.batsandlighting.co.uk/index.html for more information

7 Where appropriate, encourage and enhance public access, particularly from the Medway Towns.

8 Action for naturally widely dispersed habitats (ponds, traditional orchards), wildlife associated with arable.

Biodiversity enhancements for the site could include the following:

- Provision of hedgehog nesting boxes[8].
- Provision of 12cm square gaps under any new fencing to allow hedgehogs access onto all garden areas.
- Provision of ready-made bird boxes (sparrow terrace timber boxes or house martin nests for instance[9] or mix of open-fronted and hole-nesting boxes and constructed from woodcrete)[10].
- Provision of bat roosting spaces within the new buildings (examples can be found in: Williams, C (2010*). Biodiversity for Low and Zero Carbon Buildings: A Technical Guide for New Build*. RIBA) or installation of ready-made bat boxes (such as Kent Bat Box[11], Habibat[12], EcoSurv Bat Box or Schwegler Bat tube[13])[14].
- Provision of owl boxes in trees[15]
- Provision of reptile / amphibian hibernacula (as stand alone or within new walls by creating recesses into wall structures)[16].
- Provision of log piles for invertebrates (including stag beetles[17]), reptiles and amphibians[18],.
- Tree / shrub/ hedgerow planting (native species to be used only).
- Establish climbing plants on walls and other vertical structures[19].
- Establish wildflower plug/bulb planting in amenity grassland and private gardens [20].

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[8] http://www.hedgehogstreet.org/pages/hedgehog-homes.html

[9] to benefit these declining urban bird species

[10] In order not to damage trees, free-hanging nesting boxes can be hung from a loop or hook over a branch. This method avoids the use of nails. It is also helpful to avoid predation.

[11] http://www.teach-organic.org.uk/uploadedfiles/CMS/pdf/bat_box.pdf

[12] Habibat is a large, solid bat box made of concrete with an internal roost space, which can be incorporated into the fabric of a building http://www.habibat.co.uk/

[13] http://www.bats.org.uk/publications_download.php/1109/BCT_BatBoxProductList_v4a.pdf http://www.bats.org.uk/pages/accommodating_bats_in_buildings.html http://www.habibat.co.uk/about-habibat

[14] It is highly recommended to install bird boxes near bat boxes to avoid birds from using the bat boxes to the detriment to bats.

[15] More information can be found here http://www.barnowltrust.org.uk/infopage.html?Id=56

[16] http://www.rspb.org.uk/advice/gardening/reptiles_amphibians/hibernacula.aspx

[17] http://ptes.org/get-involved/wildlife-action/help-stag-beetles/ for more information

[18] Brash and log piles will be at least one meter high and two metres in diameter. They will comprise a mix of large and small diameter material. The centre of the pile will be compacted, but the outer part will be un-compacted. They will be located in sunny positions. They will be topped up periodically (for example every five years) with further material.

[19] More information can be found here: http://www.greenblueurban.com/climbing-plant-guide.php and http://www.london.gov.uk/priorities/environment/urban-space/parks-green-spaces/green-roofs-walls

[20] Spring flowering bulbs and plugs of nectar rich flowering plants should be embedded into amenity grassland to increase the biodiversity and amenity value of the grassland and to provide early sources of nectar for insects. Suitable bulbs include Snake's head fritillary *Fritillaria meleagris*, Ramsons *Allium*

- Establish nectar flower mixtures (essential food sources for a range of nectar-feeding insects, including butterflies and bumblebees)[21] [22][23]
- Integration of Sustainable Urban Drainage Systems (SUDS)[24].
- Integration of green or grey roofs[25],[26],[27].
- Consider using grid mesh system (or Ground Reinforcement Grids) with topsoil and seeding with a wildflower species mix, to car parking areas and new access drives to retain some vegetation as well as drainage, or Gravel turf[28].
- Planting of community orchards[29].
- Development of a full Biodiversity Management Plan of any retained areas of semi-natural habitat.

Priority should be given to species present on the Kent BAP species list, which include great crested newt, common toad, viviparous lizard, slow-worm, grass snake, adder, house sparrow, tree sparrow, hedgehog, noctule, soprano pipistrelle, brown long-eared bat, brown hare, water vole, harvest mouse, dormouse, otter as well as many more species (see http://www.kentbap.org.uk/habitats-and-species/priority-species/).

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ursinum, Snowdrop *Galanthus nivalis*, Primrose *Primula vulgaris*, Bluebell *Hyacinthoides non-scriptus*, Wild daffodil *Narcissus pseudonarcissus*, Lesser celandine *Ranunculus ficaria*

[21] http://publications.naturalengland.org.uk/publication/32005?category=42003

[22] http://www.bumblebeereintroduction.org/how-to-help/gardening-for-bumblebees/

[23] https://www.rhs.org.uk/science/conservation-biodiversity/wildlife/encourage-wildlife-to-your-garden/plants-for-pollinators

[24] http://www.ciria.org.uk/suds/index.html for more information

[25] http://www.environment-agency.gov.uk/business/sectors/91967.aspx, http://www.london.gov.uk/priorities/environment/urban-space/parks-green-spaces/green-roofs-walls and http://publications.naturalengland.org.uk/publication/31036 for more information

[26] An example of a company with extensive experience in designing biodiverse roofs in Central London: the Green Roof Consultancy http://www.greenroofconsultancy.com

[27] ‗Creating green roofs for invertebrates – a best practice guide' by Buglife http://www.kentbap.org.uk/images/uploads/Creating_Green_Roofs_for_Invertebrates_Best_practice_guidance.pdf

[28] http://www.schotterrasen.at/e_index.htm

[29] http://www.orchardnetwork.org.uk/content/case-study-planting-orchard for more information

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- Joint Nature Conservation Committee (2003). *Handbook for Phase 1 Habitat Survey: A Technique for Environmental Audit*. JNCC, Peterborough. [30]

Websites Visited:

- http://www.archnature.eu/mapping-tools.html
- http://bbowt-extra.org.uk/KWTWebMap/
- http://magic.defra.gov.uk/MagicMap.aspx

With kind permission from Google Earth Brand

[30] http://www.jncc.gov.uk/pdf/pub90_HandbookforPhase1HabitatSurveyA5.pdf

Appendix A – CITATION FOR ME07 – River Medway between Cuxton and Temple Marsh

KENT WILDLIFE SITE

Local Wildlife Site

Site Ref. No: ME07

Site:	River Medway between Cuxton and Temple Marsh
LPA:	Medway
Parish:	Cuxton
Owner:	Private
Category:	Saltmarsh, running water, standing water, grassland, scrub, spoil
Area:	94.65 ha
First notified:	1987
Last revised:	November 2001

Central Grid Ref:	TQ 725671
Natural Area:	North Downs
AONB:	No
SLA:	No
TPO:	No
Protected species:	Yes

DESCRIPTION

A mosaic of grass and scrub habitats with river, saltmarsh and mudflats, along both shores of the River Medway between Cuxton Station and Temple Marsh, has considerable avifauna interest in addition to an interesting flora.

The grazing marsh north of the railway is low-lying and brackish, with standing water in winter and several pools and dykes. This, and the grassland south of the railway, is rather species-poor, but the abundant hairy buttercup *Ranunculus sardous*, together with greater sea-spurrey *Spergularia media* and sea-milkwort *Glaux maritima* indicate their salinity. Sea clover [1] *Trifolium squamosum* has been recorded here in the past and is likely still to be present. Bird's-foot-trefoil *Lotus corniculatus* is frequent in drier areas. Meadow barley *Hordeum secalinum*, fern-grass *Catapodium rigidum* and a range of other grasses occur. Water plants include thread-leaved water-crowfoot *Ranunculus trichophyllus*, fennel pondweed *Potamogeton pectinatus* and sea club-rush *Bolboschoenus maritimus*. Marsh mallow [2] *Althaea officinalis* is occasional near the sea wall.

Saltmarsh occurs as a narrow strip on the north side near the creek and in patches along the shore and more extensively on Borstal Marsh and Wouldham Marsh on the southern side. It is dominated by common saltmarsh-grass *Puccinellia maritima* with abundant sea-milkwort. Other typical saltmarsh plants include sea club-rush, sea aster *Aster tripolium*, sea arrowgrass *Triglochin maritima*, annual sea-blite *Suaeda maritima*, English scurvy-grass *Cochlearia anglica* and a small colony of glasswort *Salicornia sp*. More marsh mallow [2] occurs on Wouldham Marsh, while sea barley [2] *Hordeum marinum* is locally abundant on the track beside the sea wall. Sea lavender *Limonium vulgare* has been recorded on Borstal Marsh. Reedbeds on the southern side form an important habitat for birds.

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On the north side, a new lagoon has been created and two more are planned to relocate the rare tentacled lagoon-worm [3, 10] *Alkamaria romijini* which was present in a lagoon now almost entirely obliterated by the new railway bridge.

Between the new river walk and the leisure complex is a bank rich in flowering plants, including yellow rattle *Rhinanthus minor,* oxeye daisy *Leucanthemum vulgare,* common knapweed *Centaurea nigra,* musk mallow *Malva moschata* and bird's-foot- trefoil.

On the north side of the Medway, east of the motorway bridge, there is a derelict cement works, with very uneven ground, heaps of chalk spoil and low cliffs. This is mostly clothed in chalk scrub and tall ruderals, but open areas support chalk-loving plants such as viper's bugloss *Echium vulgare* and marjoram *Origanum vulgare*. Slender thistle *Carduus tenuiflorus* and a good colony of milk thistle *Silybum marianum* occur here. Plants such as kidney vetch *Anthyllis vulneraria,* yellow-wort *Blackstonia perfoliata,* slender centaury *Centaurium pulchellum* and common centaury *Centaurium erythraea* may re-occur in areas currently scuffed bare by cyclists. Good numbers of common butterflies and grasshoppers can be seen in this area and it is full of birdsong.

A small strip of saltmarsh below the river bank here supports abundant sea aster, sea- purslane *Atriplex portulacoides*, English scurvy-grass, sea arrowgrass and sea-milkwort.

Chalk scrub on the slope above the low-lying pasture, dominated by hawthorn, dogwood and wayfaring tree, adds diversity to the site.

The site is important for wintering birds and nightingale [4, 5]. Warblers, green woodpecker [4], yellow wagtail [4, 6], turtle dove [6, 7, 8, 9] and kingfisher [3, 4] are probable breeding species.

1 County Scarce. Atlas of Kent Flora. Philp. 1982.
2 Nationally Scarce. Scarce Plants in Britain. JNCC. 1994.
3 Protected under Wildlife & Countryside Act 1981.
4 Amber List. Birds of Conservation Concern 2002-2007.
5 Kent Red Data Book Status 3. A. Waite (Ed.) 2000.
6 Rapid Decline. BTO Breeding Birds Report. 2000.
7 Priority Species, UK Biodiversity Action Plan. 1998.
8 Kent Red Data Book Status 2. A. Waite (Ed.) 2000.
9 Red List. Birds of Conservation Concern 2002-2007.
10 Kent Red Data Book Status K. A. Waite (Ed.) 2000.

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Appendix B – Wildlife Legislation & Policy

The following is a summary of wildlife legislation and planning policy which affords protection to plants and animals and seeks to conserve, enhance and restore biodiversity. This section is provided for general guidance only. While every effort has been made to ensure accuracy, this section should not be relied upon as a definitive statement of the law.

For further information, please see:
https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals
and
https://www.gov.uk/government/policies/protecting-biodiversity-and-ecosystems-at-home-and-abroad/supporting-pages/species-protection

Commonly encountered protected species

Many species of plants, invertebrates and animals receive protection under the legislation detailed above. However, of these, the following are the most likely to be affected by development in the southeast:

Species	Legislation
Bats (all species) Dormice Great crested newts Otters Sand lizards and smooth snakes	The Wildlife and Countryside Act 1981 (as amended) & The Conservation of Habitats and Species Regulations 2010. These make it an offence to: • Deliberately or recklessly capture, injure or kill any wild animal of a European protected species • Deliberately or recklessly disturb wild animals of any such species • Damage or destroy their breeding site or resting place • Keep, transport, sell or exchange, or offer for sale or exchange, any live or dead animal, or any part of, or anything derived from these species. Disturbance of animals includes in particular any disturbance which is likely • to impair their ability: - to survive, to breed or reproduce, or to rear or nurture their young, or - in the case of animals of a hibernating or migratory species, to hibernate or migrate; • to affect significantly the local distribution or abundance of the species to which they belong.
Breeding birds (in particular	The Wildlife and Countryside Act 1981 (as amended). This makes it illegal to intentionally kill, injure or take any wild bird and to take,

Species	Legislation
barn owls)	damage or destroy the nest (whilst being built or in use) or eggs.
Adders, grass snakes, common lizards and slow worms	The Wildlife and Countryside Act 1981 (as amended) (intentional killing and injuring only). This makes it illegal to kill or injure these animals.
Water voles	The Wildlife and Countryside Act 1981 (as amended). This makes it illegal to intentionally damage, destroy or obstruct access to any structure or place which water voles use for shelter or protection; it is also an offence to intentionally disturb water voles while they are using these places.
White clawed crayfish	The Wildlife and Countryside Act 1981 (as amended). This makes it an offence to: • intentionally, or recklessly, kill or injure any of the above species, and/or; • sell, or attempt to sell, any part of the species, alive or dead. Advertises that he buys or sells, or intends to buy or sell.
Badgers	The Protection of Badgers Act 1992. This makes it an offence to: • Willfully killing, injures or takes, or attempts to kill, injure or take, a badger. • Cruelly ill-treating a badger, digging for badgers, using badger tongs, using a firearm other than the type specified under the exceptions within the Act. • Interfering with a badger sett by damaging, destroying, obstructing, causing dog a dog to enter a sett, disturbing an occupied sett - either by intent or by negligence. • Selling or offering for sale a live badger, having possession or control of a live badger. • Marking a badger or attaching any ring, tag, or other marking device to a badger.

The Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) implements the Birds Directive (1979) and the Berne Convention (1979) into national legislation. The Wildlife and Countryside Act 1981 (as amended) includes a number of Schedules which are reviewed (usually every five years) on which details of the protected species, and their level of protection, are detailed. A detailed summary of the sections of the Wildlife and Countryside Act, along with the protection afforded under them can be found within Paragraphs 118-122 of ODPM Circular 06/2005 (Circular06/2005)

Full details of the legislation can be found at www.jncc.gov.uk/page-3614 and details of the species listed on the Schedules can be found at:

- Birds www.jncc.gov.uk/PDF/waca1981_schedule1.pdf
- Animals www.jncc.gov.uk/page-1815
- Plants www.jncc.gov.uk/page-1816

There are no licensing functions within the Wildlife and Countryside Act for development activities which may affect a species protected under The Wildlife and Countryside Act 1981 (as amended) and works need to proceed following good practice and if appropriate rely on the ‗incidental result of an otherwise lawful operation defence'. However, with regards to the water vole, where translocation of animals is proposed, Natural England does not feel this could be considered the incidental result of other activities and so would not be covered by the defence in the legislation. If there is no alternative to translocation, Natural England may be able to issue a licence to trap and translocate the water voles for the purpose of conservation.

The Countryside and Rights of Way Act 2000

The Wildlife and Countryside Act 1981 was amended by the Countryside and Rights of Way Act (CRoW Act) in 2000. The CRoW Act strengthened the protection afforded to species listed within the Schedules of the Wildlife and Countryside Act by adding ‗reckless' to several of the offences and increased the penalties for wildlife offences.

In addition, Section 74 of the CRoW Act introduced a new duty on Government Ministers and Department to further the conservation of biodiversity for habitats and species of principal importance. This was superseded by Sections 40 and 41 of the Natural Environment and Rural Communities (NERC) Act of 2006. Section 40 provides that every public authority must, in exercising its functions, have regard to the purpose of conserving biodiversity. Details of the lists of habitats and species provided for at Section 41 of the NERC act can be found at www.ukbap-reporting.org.uk/news/details.asp?X=45. The ODPM Circular 06/2005 (Circular06/2005) place a clear responsibility on Local Planning Authorities to further the conservation of habitats and species of principal importance where a planning proposal may adversely affect them.

Full details of the legislation contained within the Countryside and Rights of Way Act can be found at www.opsi.gov.uk/acts/acts2000/ukpga_20000037_en_1.

The Protection of Badgers Act 1992

The legislation affording protection to badgers is primarily concerned with animal welfare and the need to protect badgers from activities such as baiting and deliberate harm. The Protection of Badgers Act 1992 makes it an offence to:

- Wilfully kill, injure, take, possess or cruelly ill-treat a badger, or attempt to do so;
- To intentionally or recklessly interfere with a sett (this includes disturbing badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access to it).

As with The Wildlife and Countryside Act 1981 (as amended), there are several defences to prosecution in the legislation and the text should be consulted for details of these. Penalties for offences include fines up to £5,000, plus up to six months imprisonment for each illegal sett interference, or badger death or injury.

Full Details of the legislation can be found at
www.opsi.gov.uk/ACTS/acts1992/ukpga_19920051_en_1.

Conservation of Habitats and Species Regulations 2010 (SI 2010/490) came into force (the "2010 Regulations").

From 1st April 2010, these are now the principal means by which the Habitats Directive is transposed in England and Wales. This updates and consolidates all the amendments to the Regulations since they were first made in 1994.

The 2010 Regulations implement the European Habitats Directive into national legislation. Details of those species (often referred to as European protected species or EPS) which receive protection under these regulations can be found in Schedule 2 of the 2010 Regulations.

Full details of the legislation can be found at
http://www.opsi.gov.uk/si/si2010/uksi_20100490_en_1

The Regulations state that:

Part 3 - 41.—
(1) A person who:

(a) deliberately captures, injures or kills any wild animal of a European protected species,
(b) deliberately disturbs wild animals of any such species,
(c) deliberately takes or destroys the eggs of such an animal, or
(d) damages or destroys a breeding site or resting place of such an animal,

is guilty of an offence.

(2) For the purposes of paragraph (1)(b), disturbance of animals includes in particular any disturbance which is likely:

(a) to impair their ability:

(i) to survive, to breed or reproduce, or to rear or nurture their young, or
(ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate;

Or

(b) to affect significantly the local distribution or abundance of the species to which they belong.

(3) It is an offence for any person:

(a) to be in possession of, or to control,
(b) to transport,
(c) to sell or exchange, or
(d) to offer for sale or exchange, anything to which this paragraph applies.

(4) Paragraph (3) applies to—

(a) any live or dead animal or part of an animal—
(i) which has been taken from the wild, and
(ii) which is of a species or subspecies listed in Annex IV(a) to the Habitats Directive; and

(b) anything derived from such an animal or any part of such an animal.

(5) Paragraphs (1) and (3) apply regardless of the stage of the life of the animal in question.

(6) Unless the contrary is shown, in any proceedings for an offence under paragraph (1) the animal in question is presumed to have been a wild animal.

(7) In any proceedings for an offence under paragraph (3), where it is alleged that an animal or a part of an animal was taken from the wild, it is presumed, unless the contrary is shown, that that animal or part of an animal was taken from the wild.

(8) A person guilty of an offence under this regulation is liable on summary conviction to imprisonment for a term not exceeding six months or to a fine not exceeding level 5 on the standard scale, or to both.

(9) Guidance as to the application of the offences in paragraph (1)(b) or (d) in relation to particular species of animals or particular activities may be published by—

(a) the appropriate authority; or

(b) the appropriate nature conservation body, with the approval of the appropriate authority.

(10) In proceedings for an offence under paragraph (1)(b) or (d), a court must take into account any relevant guidance published under paragraph (9).

(11) In deciding upon the sentence for a person convicted of an offence under paragraph (1)(d), the court must in particular have regard to whether that person could reasonably have avoided the damage to or destruction of the breeding site or resting place concerned.

Licences may be obtained to permit activities that would otherwise be unlawful, but they can only be granted for certain purposes. Those purposes include that of preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment (Regulation 42(10). It is the imperative reasons of overriding public interest element of this that is relied upon by those seeking to carry out development where those activities affect a European protected species or their places used for shelter or protection. Even where that purpose is met, however a licence may only granted where:

- There is ~~"n~~o satisfactory alternative"; and
- The action authorised ~~"w~~ill not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range"

Natural England issues licences for this purposes under Regulation 44(2)(e).

It is not the responsibility of Natural England staff to decide when a licence is required/recommended. This decision is down to the proposer of the operation who should consider whether, on balance and usually with the assistance of an ecological consultant, the operation would be reasonably likely to result in the commission of an offence under these Regulations. This view should be formed in the light of survey information and specialist knowledge. A licence simply permits an action that is otherwise unlawful. A licence should be applied for if, on the basis of survey information and specialist knowledge, it is considered that the proposed activity is reasonably likely to result in an offence (killing, breeding site destruction, etc – see above).

It should be noted that the protection afforded to species under the UK and EU legislation referred to here is in addition to that provided by the planning system and the applicant must

ensure that any activity they undertake on the application site (regardless of whether or not planning permission has been obtained) complies with the appropriate wildlife legislation. Failure to do so may result in fines and, potentially, a custodial sentence.

Biodiversity Action Plans

Biodiversity Action Plans (BAPS) set out actions for the conservation and enhancement of biological diversity at various spatial scales. They consist of both Habitat Action Plans (HAPs) and Species Action Plans (SAPs).

The UK BAP was the UK's response to the 1992 Convention on Biological Diversity in Rio de Janeiro. Following a review in 2007 a list of 1149 priority species and 65 priority habitats has been adopted, which are given a statutory basis for planning consideration under Section 40 of the NERC Act 2006.

The UK Post-2010 Biodiversity Framework was published on 17 July 2012. It covers the period from 2011 to 2020, and was developed in response to two main drivers: the Convention on Biological Diversity‘s (CBD‘s) Strategic Plan for Biodiversity 2011-2020 and its 5 strategic goals and 20 ‗Aichi Biodiversity Targets‘, published in October 2010; and the EU Biodiversity Strategy (EUBS), released in May 2011. http://jncc.defra.gov.uk/page-6189

Further information about Kent BAP can be found here: http://www.kentbap.org.uk/habitats-and-species/priority-species/

Red Data Books

British Red Data Books (RDB) are an additional method for classifying the rarity of species, and are often seen as a natural progression from Biodiversity Action Plans.

RDB species have no automatic legal protection (unless they are protected under any of the legislation previously mentioned). Instead they provide a means of assessing rarity and highlight areas where resources may be targeted. Various categories of RDB species are recorded, based on the IUCN criteria and the UK national criteria based on presence within certain numbers of 10x10km grid-squares (see http://www.jncc.gov.uk/page-3425). As with Biodiversity Action Plans, where possible, steps should be taken to conserve RDB species which are to be affected by development.

Appendix B – Plates

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IMG_6931

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Appendix C - Bats and Lighting in the UK

Bat Conservation Trust and Institution of Lighting Engineers Summary of requirements

The two most important features of street and security lighting with respect to bats are:
1. **The UV component**. Low or zero UV installations are preferred to reduce attraction of insects to lighting and therefore to reduce the attraction of foraging bats to these areas.
2. **Restriction of the area illuminated**. Lighting must be shielded to maintain dark areas, particularly above lighting installations, and in many cases, land adjacent to the areas illuminated. The aim is to maintain dark commuting corridors for foraging and commuting bats. Bats avoid well lit areas, and these create barriers for flying bats between roosting and feeding areas.

UV characteristics:
Low
• Low pressure Sodium Lamps (SOX) emit a minimal UV component.
• High pressure Sodium Lamps (SON) emit a small UV component.
• White SON, though low in UV, emit more than regular SON.

High
• Metal Halide lamps emit more UV than SON lamps, but less than Mercury lamps
• Mercury lamps (MBF) emit a high UV component.
• Tungsten Halogen, if unfiltered, emit a high UV component
• Compact Fluorescent (CFL), if unfiltered, emit a high UV component.

Variable
• Light Emitting Diodes (LEDs) have a range of UV outputs. Variants are available with low or minimal UV output.

Glass glazing and UV filtering lenses are recommended to reduce UV output.

Street lighting
Low-pressure sodium or high-pressure sodium must be used instead of mercury or metal halide lamps. LEDs must be specified as low UV. Tungsten halogen and CFL sources must have appropriate UV filtering to reduce UV to low levels.
Lighting must be directed to where it is needed and light spillage avoided. Hoods must be used on each lamp to direct light and contain spillage. Light leakage into hedgerows and trees must be avoided.
If possible, the times during which the lighting is on overnight must be limited to provide some dark periods. If the light is fitted with a timer this must be adjusted to reduce the amount of 'lit time' and provide dark periods.

Security and domestic external lighting
The above recommendations concerning UV output and direction apply. In addition:
Lighting should illuminate only ground floor areas. Light should not leak upwards to illuminate first floor and higher levels.
Lamps of greater than 2000 lumens (150 W) must not be used.
Movement or similar sensors must be used. They must be carefully installed and aimed, to reduce the amount of time a light is on each night.
Light must illuminate only the immediate area required, by using as sharp a downward angle as possible. Light must not be directed at or close to bat roost access points or flight paths from the roost. A shield or hood can be used to control or restrict the area to be lit.

Wide angle illumination must be avoided as this will be more disturbing to foraging and commuting bats as well as people and other wildlife.
Lighting must not illuminate any bat bricks and boxes placed on buildings, trees or other nearby locations.

APPENDIX 5

Landscape and Visual Appraisal
(Barton Willmore, March 2017)

Land South of Sundridge Hill, Cuxton: Landscape and Visual Appraisal

Prepared on behalf of the Landowners

April 2017

bartonwillmore.co.uk

BARTON WILLMORE
PLANNING / DESIGN / DELIVERY

Land South of Sundridge Hill, Cuxton: Landscape and Visual Appraisal

Prepared on behalf of The Landowner

Project Ref:	**25973**
Status:	Final
Issue/ Rev:	0
Date:	April 2017
Prepared by:	WL
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Date: April 2017
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ILLUSTRATIVE MATERIAL

Figure 1: Site Context and Visual Appraisal Plan

Figure 2: Topographic Features Plan

Figure 3: Landscape Character Areas

Figure 4: Site Appraisal Plan

Site Appraisal Photographs

Site Context Photographs

APPENDICES

Appendix A.1: Extracts from Published Landscape Character Assessments

1.0 INTRODUCTION

1.1 Barton Willmore Landscape Planning and Design (BWLPD) were commissioned by the Landowner, Mr Santok Gill in February 2017 to undertake a Landscape and Visual Appraisal (LVA) for land south of Sundridge Hill, Cuxton ('the Site') to support the submission of representations to the Medway Council Local Plan 2012 – 2035 Development Options Consultation Document.

1.2 The objectives of the LVA are to assess the landscape character of the Site and its surroundings and to consider the landscape and visual qualities of the Site, its function in and contribution to the wider landscape. The work undertaken includes an assessment of the landscape policy, published landscape character assessment, existing landscape features, together with a visual appraisal of the Site and its context.

1.3 The LVA is used to inform the design evolution of the Proposed Development and to highlight likely landscape and visual receptors that may be susceptible to the development proposed. The written appraisal is supported by the illustrative material listed on the contents page.

1.4 The document is supported by the following illustrative information:

- Figure 1: Site Context and Visual Appraisal Plan;
- Figure 2: Topographical Features Plan;
- Figure 3: Site Appraisal Plan;
- Figure 4: Landscape Character Plan;
- Site Appraisal Photographs; and
- Site Context Photographs.

1.5 Land use along the north-western side of the River Medway within the vicinity of the Site and Cuxton is mixed, and includes industrial buildings, marinas, and residential development. The A228 (north of the Site) provide connectivity to the residential settlements and various land uses along the valley. Beyond this to the west, land rises more steeply, forming a backdrop that is primarily wooded with exposed chalk scarps.

1.6 Land use on the south-eastern side of the River Medway is less urbanised, and comprises primarily agricultural fields and scattered farmsteads. This land is within the Kent Downs AONB.

1.7 The Site is adjoined by residential properties on two sides; namely to the north and east, accessed from either the A228 or Pilgrims Way.

1.8 The Site is approximately 2.3 hectares in area. The Site is an area of unmanaged, sloping land which falls from 35m AOD in the north to 5m AOD in the south. It comprises a pastoral field which has been left ungrazed and which is, therefore, returning to scrub, a single storey dwelling, covered stock yard and miscellaneous single storey agricultural structures. There are a number of derelict agricultural buildings in the north-eastern corner of the Site, including an open stock pen with corrugated metal roof and a single storey brick stable building. A single storey residential dwelling and a parking platform are located within the northern corner of the Site.

1.9 With regards to relevant landscape and planning policy designations, the Site and / or the surroundings are subject to the following:

- The Kent Downs Area of Outstanding Natural Beauty extends east-west across Kent, however, the River Medway and the urbanised land to the west of the River Medway (which includes Cuxton and the Site) are excluded from the Kent Downs AONB. As such, the AONB is located to both the north and south of the Site;
- The River Medway and the land south of the A228 are designated Strategic Gap. The Site is included within this designation;
- Much of the woodland within Ranscombe Farm Country Park, which occupied the higher ground to the north of the Site and Cuxton, is designated as ancient woodland. There are no areas of ancient woodland within the Site;
- The Site is within a the Cuxton Brickfields Area of Local Landscape Importance as identified within the Medway Local Plan 2003;
- There are no listed buildings within the Site or adjoining the Site; and
- There are no Scheduled Monuments within the Site or adjoining the Site.

1.10 There are no Public Rights of Way within the Site.

1.11 As demonstrated by the above, the Site is located within an urbanised area situated on the lower slopes of the western side of the valley of the River Medway. The Site is within the Area of Local Landscape Importance and the Strategic Gap.

2.0 METHODOLOGY FOR LANDSCAPE AND VISUAL APPRAISAL

2.1 The Landscape and Visual Appraisal (LVA) has been prepared with reference to the Guidelines for Landscape and Visual Impact Assessment 3rd Edition[1] (GLVIA3).

2.2 A desktop review of the study area was undertaken, including a review of the relevant landscape and visual policy, published landscape character information, topography, landscape features, and landscape designations. This information was used as the initial basis against which to appraise the Site, and a site visit was undertaken in November 2016.

2.3 To determine the extent of visual influence, a visual appraisal was undertaken of the Site to consider the nature of existing views from publicly accessible viewpoints including roads, Public Rights of Way (PRoW) and public open space. Views were considered from all directions and from a range of distances. The viewpoints chosen are not intended to be exhaustive, but rather to represent the potential views obtained towards the Site. The **Site Context Photographs** are included within the illustrative material accompanying this document and the locations of the representative viewpoints are shown on **Figure 1: Site Context and Visual Appraisal Plan**.

[1] Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment. Third Edition

3.0 LANDSCAPE PLANNING BASELINE

National Landscape Policy - NPPF

3.1 The NPPF aims to provide a planning framework within which the local community and local authorities can produce distinctive local plans which respond to local needs and priorities.

3.2 The NPPF promotes a presumption in favour of sustainable development, defined as **"meeting the needs of the present without compromising the ability of future generations to meet their own needs"**, and providing it is in accordance with the relevant up-to-date Local Plan and policies set out in the NPPF, including those identifying restrictions with regard to designated areas.

3.3 Paragraph 14 describes the key theme throughout the Framework is that of 'Achieving Sustainable Development' and confirms that the **"presumption in favour of sustainable development"** should be seen as a **"golden thread running through both plan-making and decision-taking"**.

> ***"For decision – taking this means:***
> ***(i) "Approving development proposals that accord with the development plan without delay; and***
> ***(ii) Where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless:***
>
> - *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
> - *Specific policies in this Framework indicate development should be restricted."*

3.4 In respect of the latter, footnote 9 within the Framework identifies the types of areas where development should be restricted and lists sites protected by the Birds and Habitats Directive and/or designated as SSSI's; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets and locations at risk of flooding or coastal erosion.

3.5 The site is not subject to any Footnote 9 criteria.

3.6 Twelve Core Planning Principles are set out at Paragraph 17, of which the following are relevant to landscape and visual matters, stating that planning should:

> - *"not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;*

- *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;*
- *contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;*
- *promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage or food production); and*
- *conserve heritage assets in a manner appropriate to their significance, so they can be enjoyed for their contribution to the quality of life of this and future generations."*

3.7 The NPPF then identifies thirteen aspects which should be considered in developing local plans and reviewing planning applications. Those of relevance to the landscape and visual considerations of the Site and proposed development include Section 7: Requiring good design. Paragraph 58 states that planning policies and decisions should aim to ensure that developments, inter alia:

> ***"...Establish a strong sense of place...***
> ***respond to local character and history, and reflect the identity of local surroundings...***
> ***are visually attractive as a result of good architecture and appropriate landscaping."***

3.8 Paragraph 61 states that:

> ***"planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment."***

3.9 Section 11: Conserving and Enhancing the Natural Environment notes in paragraph 109 that the planning system should contribute to and enhance the natural and local environment by inter alia *"protecting and enhancing valued landscapes, geological conservation interests and soils"*.

3.10 Paragraph 110 sets out that the aim, in preparing plans for development, should be to minimise adverse effects on the local and natural environment, and that plans should allocate land with the least environmental or amenity value.

3.11 Paragraph 113 states that:

> ***"Local planning authorities should set criteria based on policies against which proposals for any development on or affecting... landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks."***

3.12 Paragraph 114 notes that furthermore, local planning authorities should:

> ***"set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure."***

3.13 Paragraph 125 states that:

> ***"By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation."***

Planning Practice Guidance (PPG) (March 2014)[2]

3.14 Under the heading of Natural Environment, sub-heading Landscape, paragraph 001, PPG supports the use of landscape character assessment as a tool for understanding the character and local distinctiveness of the landscape and identifying the features that give it a sense of place as a means to informing, planning and managing change. PPG makes reference to Natural England guidance on landscape character assessment.

3.15 Paragraphs 002 to 005 address Areas of Outstanding Natural Beauty and how these inform the strategic context for development.

3.16 Under the heading of Natural Environment, sub-heading Biodiversity, ecosystems and green infrastructure, paragraph 15, PPG supports positive planning for networks of multi-functional green space, both urban and rural, which deliver a range of benefits for local communities and makes reference to Natural England guidance on Green Infrastructure.

3.17 In addition, National Planning Policy Guidance (NPPG) on Noise describes the factors that are relevant to identifying areas that should be protected for its tranquillity. Although there are no precise rules, an area should be relatively undisturbed by noise from human caused sources that undermine the intrinsic character of the area and the area should already be valued for

[2] Department for Communities and Local Government (2014) *National Planning Practice Guidance*

its tranquillity, including *"the ability to perceive and enjoy the natural soundscape"* and are likely to be seen as special for other reasons, including their landscape.

Local Landscape Policy – Saved Policies of the Medway Local Plan 2003[3]

3.18 The Site is located within the bounds of the Medway Unitary Authority and is subject to the development plan produced by Medway. Medway Council is part way through the development of its new Local Plan and has completed a consultation version of the Development Options Document. The parts of the current development plan relevant to the Site comprise the saved policies of the Medway local Plan 2003 (May 2003).

3.19 One of the key objectives outlined within the Medway Local Plan is *"developing an integrated approach to the conversion, development and use of land to secure improvements to the built and natural environment"*.

3.20 Within the strategic objectives set out within the plan, the document states: *"The development of greenfield sites should be restricted to those well related to the structure of the urban area and avoiding visual intrusion into the surrounding countryside, particularly the valuable urban fringe"* (Strategic objective ii).

3.21 Strategic objective viii states that there should be *"Firm protection for the Green Belt, the best and most versatile agricultural land, sites of international, national and other strategic importance for nature conservation and landscape"*.

3.22 The following saved policies of the Local Plan are of relevance to the Site:

- Policy S1: Development Strategy states that *"The development strategy for the plan area is to prioritise re- investment in the urban fabric. This will include the redevelopment and recycling of under-used and derelict land within the urban area…*
  In recognition of their particular quality and character, long-term protection will be afforded to:

  i) areas of international, national or other strategic importance for nature conservation and landscape;

- Policy S4: Landscape and Urban Design states that *"A high quality of built environment will be sought from new development, with landscape mitigation*

[3] Medway Council (2003) *Medway Local Plan Saved Policies Saved 2007*

where appropriate. Development should respond appropriately to its context, reflecting a distinct local character."

3.23 In relation to the Built and Natural Environment, the Local Plan states the following:

- *"The objectives underlining the policies in this chapter are:*

  ii) to protect and enhance the character, diversity and distinctiveness of the countryside, built and natural environments, with particular emphasis on identifiable assets such as:

    a) the Metropolitan Green Belt and strategically and locally important gaps between settlements;
    b) areas of strategic and local landscape importance;
    c) nature conservation and geological sites of international, county or local importance;
    d) areas of the best and most versatile agricultural land; and
    e) conservation areas, ancient monuments and listed buildings;

  iii) to sustain and diversify the rural economy and to make allowance for necessary change in the countryside and natural environment;
  iv) to ensure that development takes into account its environmental consequences, being suitably located and well designed, respecting environmental assets and taking the opportunity to enhance current environmental conditions;
  v) to improve the built environment by seeking a high standard of design in new development or alterations to existing buildings;
  vii) to enhance the environment by seeking to remove eyesores and restore and improve the appearance of areas of poor townscape, particularly in high profile areas such as the riverside and along strategic routes;
  viii) to promote imaginative site planning and landscape design to achieve quality open space on development sites."

- Policy BNE1: General Principles for Built Development – *"The design of development… should be appropriate in relation to the character, appearance and functioning of the built and natural environment by:*

  i) being satisfactory in terms of use, scale, mass, proportion, details, materials, layout and siting; and

ii) respecting the scale, appearance and location of buildings, spaces and the visual amenity of the surrounding area; and

iii) where appropriate, providing well structured, practical and attractive areas of open space."

- Policy BNE5: Lighting – *"External lighting schemes should demonstrate that they are the minimum necessary for security, safety or working purposes. Development should seek to minimise the loss of amenity from light glare and spillage, particularly that affecting residential areas, areas of nature conservation interest and the landscape qualities of countryside areas."*
- Policy BNE6: Landscape Design – *"Major developments should include a structural landscaping scheme to enhance the character of the locality. Detailed landscaping schemes should be submitted before development commences and should have regard to the following factors:*

iv) provide a structured, robust, attractive, long term, easily maintainable environment including quality open spaces, vistas and views;

v) include planting of a size, scale and form appropriate to the location and landform, taking account of underground and overground services;

iv) retain important existing landscape features, including trees and hedgerows, and be well related to open space features in the locality;

v) support wildlife by the creation or enhancement of semi-natural habitats and the use of indigenous plant material where appropriate; and

vi) include an existing site survey, maintenance and management regimes and a timetable for implementation."

- Policy BNE22 Environmental Enhancement – *"Development leading to the protection and improvement of the appearance and environment of existing and proposed areas of development, transport corridors, open spaces and areas adjacent to the River Medway will be permitted."*
- Policy BNE25: Development in The Countryside – *"Development in the countryside will only be permitted if:*

i) it maintains, and wherever possible enhances, the character, amenity and functioning of the countryside, including the river environment of the Medway and Thames, it offers a realistic chance of access by a range of transport modes…

The countryside is defined as that land outside the urban and rural settlement boundaries defined on the proposals map."

- Policy BNE31: Strategic Gap – *"Within the strategic gap, as defined on the proposals map, development will only be permitted when it does not:*

  i) result in a significant expansion of the built confines of existing settlements; or
  ii) significantly degrade the open character or separating function of the strategic gap."

- Policy BNE34: Areas of Local Landscape Importance – *"Within the Areas of Local Landscape Importance defined on the Proposals Map, development will only be permitted if:*

  i) it does not materially harm the landscape character and function of the area; or
  ii) the economic and social benefits are so important that they outweigh the local priority to conserve the area's landscape.

  Development within an Area of Local Landscape importance should be sited, designed and landscaped to minimise harm to the area's landscape character and function."

- Policy BNE42: Hedgerow Retention – *"Important hedgerows will be retained and protected."*
- Policy BNE43: Trees on Development Sites – *"Development should seek to retain trees, woodlands, hedgerows and other landscape features that provide a valuable contribution to local character."*
- Policy L10: Public Rights of Way – *"Development which would prejudice the amenity, or result in the diversion or closure, of existing public rights of way will not be permitted, unless an acceptable alternative route with comparable or improved amenity can be provided."*

Local Landscape Policy – Medway Council Local Plan 2013-2035: Development Options Regulation 18 Consultation Report (January 2017)[4]

3.24 The Consultation Report does not include policies but outlines 'policy approaches'. Extracts from the text and the policy approaches highlights the Council's requirements to protect and

[4] Medway Council (January 2017) *Local Plan 2013-2035: Development Options Regulation 18 Consultation Report*

enhance the natural environment, respond to the landscape context and promote the creation of Green Infrastructure.

3.25 The reports states that the aim of the new local plan is ***"to ensure that Medway grows sustainably, and to provide land for the homes, jobs and services that people need, whilst protecting and enhancing the qualities of the area's environment and heritage"*** outlining from the beginning that the quality of the environment is a priority.

3.26 As part of its developing vision for 2035, the report states:

> ***"By 2035 Medway will be a leading waterfront University city…noted for…its stunning natural and historic assets and countryside...***
> ***Medway will have secured the best of its intrinsic heritage and landscapes alongside high quality development to strengthen the area's distinctive character…***
> ***The distinct towns and villages that make up Medway will be connected through effective … green infrastructure links supporting nature and healthy communities…***
> ***Medway will be defined by development that respects the character, functions and qualities of the natural and historic environments…to ensure that important wildlife and heritage assets are protected and opportunities are realised to enhance their condition and connectivity."***

3.27 Paragraph 2.37 states the importance of the landscape to Medway:

> ***"The natural and historic environment will continue to inform how Medway looks and functions. The river and estuary of the Medway have defined the history of its urban and rural areas. They are also central to the vision for Medway's future growth…"***

3.28 Under the heading of 'Strategic Objectives', the report outlines a number of strategic objective, of which the following are of relevance to the Proposed Development:

"A riverside city connected to its natural surroundings

- *To secure a strong green infrastructure network that protects the assets of the natural and historic environments in urban and rural Medway, and informs the design and sustainability of new development.*

Ambitious in attracting investment and successful in place-making

- *To deliver sustainable development, meeting the needs of Medway's communities, respecting the natural and historic environment, and directing growth to the most suitable locations that can enhance Medway's economic, social and environmental characteristics…*

- *To establish quality design in all new development, respecting the character of the local environment and seeking opportunities to boost quality and improve the accessibility and design of the public realm…"*

3.29 The document makes reference to the geography, stating:

> ***"This complex geography demands that any development that comes forward in greenfield areas must be of high quality and sensitive to the natural environment, as well as addressing needs for services and infrastructure. In planning for Medway's future development, the council wants to safeguard and establish strategic green spaces and corridors, to protect wildlife features and provide healthy and attractive places for people to live and work."***

3.30 Paragraph 7.3 states that, during the consultation on the 'Issues and Options' stage, *"there was much support for the protection of green spaces (both urban and rural) and the important features of the area's natural and historic environment… There were varying views on the approaches to reconciling development needs with protecting the environment, but recognition that well designed, sustainable development, located sensitively, could provide opportunities to invest in enhancements in the environment and improve connectivity for people and wildlife."*

3.31 Paragraph 7.4 recognises *"the extent of areas that are designated of international or national importance for their biodiversity and landscape value"*.

3.32 Paragraph 7.14 highlights the importance and desire for Green Infrastructure:

> ***"Working at a landscape scale, a green infrastructure network of parks and paths, watercourses, and farmed, forested and natural environments will seek to embed connectivity for people and wildlife."***

3.33 Under the Policy Approach: Securing strong Green Infrastructure, the report states:

> ***"The council will protect the network of green infrastructure across rural and urban Medway…***
> ***Wider components of the green infrastructure network will be protected in line with the analysis and strategy set out in the emerging Green Infrastructure Framework. This will include open space assets, landscape buffers and green infrastructure zones. New development should provide for green infrastructure that supports the successful integration of development into the landscape, and contributes to improved connectivity and public access, biodiversity, landscape conservation, design, management of heritage features, recreation and seeks opportunities to strengthen the resilience of the natural environment.***

> ***The council will promote the extension of the green infrastructure network through setting criteria for the establishment and maintenance of Local Green Spaces. Opportunities will be sought to promote and enhance the public rights of way network, including footpaths, bridleways and cycle routes, in particular to address existing gaps in connectivity and extend appropriate access along the riverside."***

3.34 Under the Policy Approach: Landscape, the report states:

> ***"The highest protection will be given to the Kent Downs AONB to conserve and enhance its natural beauty, including the consideration of potential impact on its setting…The council will expect development to respect the character and qualities of the surrounding landscape. An updated Medway Landscape Character Assessment and Green Infrastructure Framework will provide a basis for determining the acceptability of development proposals and areas and features that need to be protected and enhanced."***

3.35 Under Policy approach: Design, the report states that new development in Medway:

> ***"will be expected to be of high quality design that makes a positive contribution appropriate to the character and appearance of its surroundings. Fundamental considerations of development proposals will include:***
>
> - *The scale and form of development is appropriate to its surrounding context and is characteristic of Medway*
> - *How the proposal relates to and/or reinforces the local distinctiveness and character through the use of high quality materials, landscaping and building detailing*
> - *Responds appropriately to the character of the area, interprets respectfully the prevailing pattern of plot size, plot layout and building siting, roofscapes, mass, bulk and height, and views into and out of the site…*
> - *High quality landscaping making use of or retaining features considered relevant/important by the Council and demonstrating linkages/contribution toward green infrastructure assets and networks.*
> - *Achieves a transition from urban to rural where appropriate"*

Issues Arising from the Policy Baseline

3.36 National and local development policy seeks to protect and enhance the character of the built and natural landscape, including the protection of landscape features and the creation of green infrastructure. Special mention is made to the protection of important trees and hedgerows and their contribution to the wider landscape character.

3.37 The protection of the AONB and its setting is a key theme and, although the Site is not within the AONB, it is within the setting and its impacts on views to and from the AONB must be considered.

3.38 The protection and enhancement of the corridor of the River Medway is a key theme with the desire expressed to improve visual and physical access to the river.

3.39 The protection of the amenity of the Public Rights of Way (PRoW) is stated. Although no PRoW pass through the Site and will not, therefore, be physically impacted upon by the proposals, views from the local PRoW must be considered.

3.40 The Site is located within the Strategic Gap and within the Cuxton Fields Area of Local Landscape Importance. The contribution that the Site makes to those designations must be considered along with the impact of any development on them.

4.0 PUBLISHED LANDSCAPE CHARACTER ASSESSMENTS

4.1 The landscape character assessment approach is a descriptive approach that seeks to identify and define the distinct character of landscapes that make up the country. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF Core Principles.

4.2 The description of each landscape is used as a basis for evaluation in order to make judgements to guide, for example, development or landscape management. The extent of published landscape character areas in the vicinity of the Site are illustrated on **Figure 3: Landscape Character Plan** and extracts from the relevant landscape character assessments are included within Appendix A.1.

National Character Areas - Natural England's National Character Area Profile 119: North Downs

4.3 The Site lies within the North Downs Landscape Character Area (LCA), which are described within the character assessment as comprising a line of chalk hills running from Surrey to the White Cliffs of Dover.

4.4 Key characteristics identified on page 8 include:

- *"…A distinctive chalk downland ridge…*
- *… Chalk soils are predominant across the NCA…*
- *The area is cut by the deep valleys of the Stour, Medway, Darent, Wey and Mole… which contrast with the steep scarp slope…*
- *Woodland is found primarily on the steeper slopes… Well wooded hedgerows and shaws are an important component of the field boundaries, contributing strongly to a wooded character…*
- *Small, nucleated villages and scattered farmsteads including oasts and barns form the settlement pattern… "*

County Character Areas - Kent Landscape Character Assessment

4.5 The Site falls within the Kent character area: Medway Valley Lower within the Greensand Belt in the Landscape Assessment of Kent (2004)[5].

4.6 The Medway Valley Lower is described as:

> ***"Essentially a flat landscape developed on the valley alluviums around the meandering river Medway between the tidal lock at Allington on the Maidstone outskirts to Halling downstream…***

[5] Jacobs Babtie (2004) The Landscape Assessment of Kent Maidstone: Kent County Council

> ***Much of the landscape is a rather untidy sprawl of settlements and industry … that have developed along the river's flanks, most particularly in the west of the valley. It is distinguished by dramatic mineral sites associated with gravel and clay extraction, either still working … or reclaimed … Amongst the enterprises that traditionally used the river, some remain. Many of these are of an industrial nature, such as scrap metal yards, which inevitably detract from the visual quality of the riverside."***

4.7 The river is described as…

> ***"an important and distinctive feature within the character area"***

4.8 …and the areas of emergent planting at the margins

> ***"contrast strongly with the more industrialised areas to the south…***
> ***"On the west bank, the landscape is dominated by housing, industry, pylons and arable farming…Allowance should be made for vegetated buffer zones adjacent to the river, to enhance its aquatic habitats and amenity value…Much of the east bank remains a tranquil although degraded landscape…The area's current relative isolation is likely to be affected by these*** **[development]** ***proposals" which are also described as being "likely to be highly visible from the Kent Downs AONB".***

4.9 Characteristic features of the area are described as:

- *"Tidal river with well-developed meanders.*
- *Residual unimproved grasslands and reedbeds forming important areas for nature conservation.*
- *Well-developed industrial mineral and urban sites particularly on the west bank."*

4.10 The condition of the character area is described as ***"Very Poor"*** for the following reasons:

> ***Visual unity is incoherent and there are many detracting features. Views are contained by the surrounding Downs but the wide tidal river valley landscape is fragmented by extensive industrial works, floodplain management structures, new riverside residential developments and valley side quarries. Clusters of habitat include wet pasture reed beds and regenerative scrub, but industrial, residential and quarrying activities fragment the ecological interest overall. Aylesford Priory ragstone and flint churches and historic floodbanks are important heritage features, but field boundaries and tree cover are in poor condition. The built development generally detracts from the landscape, with massive industrial complexes, dramatic chimneys and high density residential areas in highly coloured brick. Overall, this is a landscape in very poor condition."***

4.11 The sensitivity of the landscape is described as ***"Moderate"*** for the following reasons:

> ***"The strength of character is weak with a lack of local distinctiveness and, in many areas, only a relatively recent time depth. Landform is an apparent element and the lack of significant tree cover creates a highly visible landscape."***

District Level Landscape Character Assessment

4.12 The Site falls within local landscape character area 36: Cuxton Scarp Foot within the North Downs and Medway Valley Landscape Area, according to the Medway Landscape Character Assessment (2011)[6].

4.13 The key characteristics of the Medway Valley are described as:

- *Mixture of lower scarp slope and valley floor mixed farmland; fragmented by several disused and inaccessible quarries with regenerating woodland edges that help to screen visual impacts*
- *Pockets of grazed marshland with flood defence walls and reed beds; boundary treatments in variable condition; areas generally retain rural character but with rural fringe intrusions and some detracting features*
- *Landscape heavily fragmented by historic land uses associated with chalk extraction industries; includes quarries; railway lines; busy roads; settlements; old wharfs; marinas, mobile homes, industrial areas etc.*

4.14 Principle issues for the Landscape Area are described as:

- *"On-going threat of landscape fragmentation with loss of rural character and local distinctiveness caused by the intrusion of inappropriate urban fringe activities – particularly threatened and damaged areas are on western side of river and include Cuxton Scarp Foot, Halling Quarries, Halling and Holborough Marshes*
- *Medway Valley – the disused pits offer regeneration opportunities for development, recreation and biodiversity improvements*
- *Industrial heritage within Medway Valley forms part of local distinctiveness of area*
- *Current regeneration proposals include a new development scheme for the Halling Cement Works site and proposals for new road and bridge across Lafarge Cement Works site at Holborough; forms link to Tonbridge and Malling's Peter's Pit development within the Local Plan) are located on fringes of urban areas at Walderslade; these extend into larger green spaces within neighbouring districts and are not identified as distinct character areas within this study."*

[6] Medway Council (2011) Medway Landscape Character Assessment

4.15 The Cuxton Scarp Foot is described as a 'rural-fringe' type landscape and as the 'rural-urban fringe with urban/industrial influences' landscape sub-type. This area is described as being location to the north of the River Medway and to the west of the M2 motorway. The key characteristics of this area are as follows:

- *"Visually prominent area rising from marshes alongside River Medway up to Kent Downs AONB*
- *Prominent in views from many directions (including A228, M2, CTRL, Medway Valley Railway and the Medway River); has significant potential as an inviting 'gateway' into the urban areas of Medway*
- *Includes farmland to north along scarp foot and lower lying marshland to south*
- *Includes land affected by M2/CTRL works; adverse impacts persist in areas adjacent to this development*
- *Lagoons in marshland area to south-east created as part of mitigation for CTRL works*
- *Area has fragmented character from urban fringe land uses, motorway and railway line; land uses include rough grazing pasture; marshland; woodland; site of nature conservation interest; sewage works; landfill/waste site; derelict land; caravan site*
- *Railway line creates strong severance – restricts accessibility to marshland and marina*
- *Mixed containment (footpath link and woodland) and openness (marshland and farmland)*
- *Strong urban fringe intrusion with overall degraded condition, includes areas of fly-tipping*
- *Openness maintains separation between urban areas, M2 and CTRL and Cuxton Village; helps to retain local identity and enhance village setting*
- *Provides visual link and balance with Kent Downs AONB on adjacent side of river"*

4.16 The condition of the area is described as "*Very Poor"* with an incoherent pattern of landscape, many distracting features and a fragmented visual unity. The sensitivity of the landscape is described as *"Moderate"* with an action to *"Restore and Create"*.

4.17 Key issues within the character area are as follows:

- *"Managing urban fringe intrusion/activities including fly-tipping*
- *Restricted access beyond main footpath link*
- *Main footpath unattractive and intimidating*
- *Off-road cycle path opportunity*
- *Severance of M2; weak and unattractive pedestrian/cycle links into urban areas to north*
- *Opportunity to enhance 'Gateway' potential of area*
- *Marina site has been built up with imported materials; developed character not in sympathy with marshland context."*

Guidelines for Future Change

4.18 There are four Statements of Environmental Opportunity for the character area, of which the following are relevant:

- *"SEO 1: Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations.*
- *SEO 2: Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs, for their internationally and nationally important habitats and species, cultural heritage and recreational value and to help to deliver climate change mitigation and adaptation. Seek opportunities to establish local markets for timber and biomass to support the active management of local woods, while recognising their contribution to sense of place, sense of history and tranquillity.*
- *SEO 4: Plan to deliver integrated, well-managed multi-functional green space in existing and developing urban areas, providing social, economic and environmental benefits and reinforcing landscape character and local distinctiveness, particularly on or alongside the boundaries of the designated landscapes within the North Downs."*

4.19 Key Landscape opportunities within NCA Profile 119 identified on page 54 include:

- *"Protect, conserve, an appropriately manage the highly distinctive chalk cliff coastline…*
- *Protect, conserve and enhance the character of much of the downland landscape devoid of development and urban intrusions… .*
- *…restoring, significantly expanding and relinking the wetland habitats of the Medway Gap…*
- *Manage, conserve, enhance and restore the characteristic pattern of thick well-treed hedgerows and shaws, forming a predominantly irregular field pattern."*

County – Medway Valley Lower

4.20 The guidance for the Medway Valley landscape character area is to ***"Restore and Create"***.

"Restoration and creation of unimproved pastures and reed beds should be used to increase the nature conservation potential and naturalistic landscape qualities of the river floodplain. Tree planting proposals need careful consideration to avoid destroying the open character of the landscape. Scrub and hedges may be more appropriate in integrating the built developments into the valley.

Where they are in a manageable context, existing hedgelines should be gapped up and properly maintained. New hedgerow proposals should aim to link existing remnant hedgerows. Where appropriate, new developments should be sensitively sited and designed to reflect the riverside context."

Local – Cuxton Foot Scarp

4.21 The guidance for the Cuxton Foot Scarp landscape character area is to *"Restore and Create"*.

- *"Review cycle path opportunities linking urban areas to countryside*
- *Improve path network and pedestrian links through area, onto valley sides and into urban areas to north*
- *Restore and improve chalk grassland areas to north*
- *Improve boundary treatment to eyesores – including screen to sewage works entrance; replace galvanised steel palisade boundary fencing with more sympathetic style and finish of security fencing; screen with native planting where possible*
- *Protect and enhance natural marshland character along river edges as appropriate setting for adjacent river and AONB*
- *Restore and actively manage hedgerows along field, path and road boundaries and strengthen woodland blocks*
- *Resist development and urban fringe activities that could lead to further degradation of condition, accessibility and rural character of area*
- *Seek to develop 'gateway' potential of area; landscape enhancements to M2/A228 roundabout and approach roads could achieve step change in arrival experience of visitors into Medway".*

Issues Arising from the Landscape Character Assessments

4.22 The national landscape character assessment identifies the wider area which comprises the Kent Downs AONB, an area of distinct landscapes, historic depth and ancient vegetation. The regional and local character assessments, being at a finer grain, identify the contrasting character of the development along the River Medway, in which the Site is located, and its divergence from the character of the higher land within the AONB.

4.23 The regional and local landscape character assessments identify that the areas including the Site comprise areas of landscape that are in *Very Poor* condition and that there is an action to *Restore and Create*.

4.24 Guidance within the landscape character assessments identifies the importance of vegetation within developments to soften the massing of the built form and to aid the sensitive integration of development into the surrounding landscape when seen in views. This includes the restoration and replacement of native hedgerows and the planting of scrub and trees.

5.0 LANDSCAPE APPRAISAL

5.1 The location of the Site is shown on **Figure 1: Site Context Plan** and a more detailed illustration of the map is shown on **Figure 4: Site Appraisal Plan**. The character of the Site is demonstrated within the series of **Site Appraisal Photographs**, the locations of which are demonstrated on **Figure 4: Site Appraisal Plan**.

Site and its Location

5.2 The Site is located in Cuxton on the northern side of the valley of the River Medway. It is located at the foot of the South Downs close to the boundary with the Area of Outstanding Natural Beauty (AONB). The Site comprises a pastoral field, which has been left ungrazed and which is returning to scrub, a single storey dwelling, a covered stock area and a number of agricultural sheds and stables.

5.3 The north-western boundary is formed by the A228 Sundridge Hill which is located on higher ground than the main body of the Site, resulting in a steep slope into the edge of the Site. There is a row of coniferous trees, which have been planted as a hedgerow and left unmanaged, at the eastern end of this boundary with an unmanaged hedgerow, which has been left to become gappy, and trees along the remainder of the boundary. To the north of the A228 is the built edge of Cuxton. The western boundary is marked by a remnant post and wire fence and a line of trees. Beyond the boundary is a pastoral field, grazed by ponies, and areas of shrub and tree planting. The southern boundary is marked by an unmanaged hedgerow which has become overgrown and gappy with some small trees. To the south is an area of marsh and further south is the railway line and the River Medway. The eastern boundary comprises a mix of overgrown hedgerow and the curtilage of properties at Rainbow's End. Further east is an area of pastoral farmland.

Local Land Use

5.4 The area to the north comprises residential development within Cuxton and the fields to the east and west are pastoral with an area of marshy ground to the south. Along the river valley to the south area marinas and associated boatyards, part of the general industrial and fringe character of the northern bank of the river. Further to the east is a recycling centre and a Travellers' site. Approximately 900m to the north-east lies the built edge of Strood and Rochester.

5.5 The land to the north of the Southern Railway Line, approximately 120m to the north, and to the south of the River Medway, approximately 450m to the south-east, comprises countryside within the Kent Downs AONB.

Access and Rights of Way

5.6 Access into the Site is from the A228 Sundridge Hill which also serves the south and east of Cuxton. There are two railway lines in close proximity to the Site, 114m to the north (HS1) and 150m to the south (Medway Valley line). Cuxton Station is located approximately 210m to the south. The M2 motorway is located 600m to the north-east of the Site.

5.7 The North Downs Way runs approximately east to west through the northern part of the study area, approximately 550m to the north of the Site. A further network of Public Rights of Way extends through the AONB to the north, connecting into Ranscombe Farm Country Park to the north.

Topography and Hydrology

5.8 The Site ranges from approximately 10mAOD along the south-eastern boundary to approximately 30mAOD in the northern corner. The Site is located on the northern bank of the River Medway as it rises up to the Kent Downs to over 130mAOD (metres above Ordnance Datum) at William's Hill approximately 2.4km to the north-west. The area of marsh to the immediate south is located at approximately sea level. The area to the south comprises the Wouldham Marshes before the land rises again to the Kent Downs to the south.

Vegetation

5.9 There are the remnants of an unmanaged hedgerow running along the north-western boundary of the Site, spreading down the slope into the Site. There is a line of trees along the western boundary. The southern boundary is marked by a line of trees and shrubs which were originally part of a wider area of planting in the southern part of the Site which has since been cleared.

5.10 In the wider area, the land to the south of the river is generally unvegetated whereas the land in the AONB and Country Park to the north of the Site contains large areas of Ancient Woodland, as shown on Figure 1: Site Context Plan.

Designations

Landscape Designations

5.11 The Kent Downs AONB is located approximately 150m away to the north and approximately 500m away to the south-east. As such, the Site can be considered to be within the setting of the AONB. Views from the AONB are considered within the visual appraisal and are shown to be limited by vegetation and topography with glimpsed views possible from the PRoW on the southern edge of the Ranscombe Farm Country Park.

5.12 The Site is located within the Cuxton Brickfields Area of Local Landscape Importance (ALLI). The Medway Local Plan includes the following information about the Cuxton Brickfields ALLI:

> ***"Visually prominent area rising from marshes along River Medway up to the Kent Downs AONB. Includes former Cuxton Chalk Pits 1 and 2 now landscaped. Adjacent land affected by M2/CTRL works will take time to recover, so protection of this landscape is important…***
> ***Maintains the separation between Strood and Cuxton, helping to retain individual identity. Contributes towards the setting of Cuxton Village. Extremely prominent from A228, M2, CTRL, Medway valley railway and the river – when approaching or passing through the borough. Forms a gateway to the urban area to be preserved and enhanced. Forms a green backdrop to Medway Valley Park from across the river in Borstal and Rochester. 94 Creates a visual link and balance with the Kent Downs AONB on the other side of the river."***

5.13 Effects on the character of the ALLI should be considered within any future scheme. However, development within the Site will not reduce the perception of the gap between Strood and Cuxton as the development will not extend further east than the development to the north and already contains and neighbours development on the eastern boundary. The Site is visible from the area to the south of the river but, from these locations, it forms a minor element viewed set back against and within the context of the existing residential and industrial development. The existing planting within the Site should be retained where practicable and new areas of planting established to reinforce the green edge to the AONB.

Historic Designations

5.14 The Grade II* Cobham Hall Registered Parkland is located 2km to the north-west of the Site. Cuxton Palaeolithic Schedule Monument is located approximately 450m to the south-west. The closest Listed Building is the Grade II White Hart House, located 250m to the south-west. Development within the Site will not physically affect any of these designations.

Planning Policy

5.15 The Site is located within the Strategic Gap between Cuxton and Rochester. The Medway Local Plan states in Policy BNE31: Strategic Gap:

> ***Within the strategic gap, as defined on the proposals map, development will only be permitted when it does not:***
>
> ***ii) result in a significant expansion of the built confines of existing settlements; or***
> ***iii) significantly degrade the open character or separating function of the strategic gap.***

5.16 Development within the Site will not extend further east than the existing development to the north on Pilgrims Way or further south than the residential development to the west. As such, it will not result in the reduction of the gap between Cuxton and Strood/Rochester. Development within the Site will be viewed as set back against or within the context of the neighbouring residential development and therefore will not 'significantly degrade the open character' of the Strategic Gap.

5.17 The Site is located outside of the Green Belt and separated from it by the intervening Medway Valley Railway Line.

Issues Arising from the Landscape Appraisal

5.18 The Site is an unmanaged area of pastoral land containing a number of derelict or semi-derelict agricultural structures, a single storey residential dwelling and an elevated car platform. It is located on rising ground on the northern edge of the valley of the River Medway and is seen set back against and within the context of the surrounding residential development and within the context of boatyards, the Travellers' site and industrial areas along the course of the river.

5.19 The Site is located within the Cuxton Brickfields ALLI which is described as a visually prominent area maintaining the separation between Cuxton and Strood and forming a green backdrop to the river and a green edge to the AONB. It is also located within the Strategic Gap between Cuxton and Rochester in which development is not permitted if it will reduce the separation of the settlements or degrade the open character of the Strategic Gap.

5.20 The Site does not form the functions of the ALLI and will not be contrary to the purposes of the Strategic Gap as set out within the planning policies identified above as it does not extend further east or south than the neighbouring existing residential development and contains some built structures. It is visible from the southern side of the river but forms a minor element within the view, set back against and viewed within the context of existing residential development to the north and east, and to industrial and employment uses to the south and east.

6.0 VISUAL APPRAISAL

6.1 Available views towards the Site are represented by **Site Context Photographs**, the location of which are shown on **Figure 1: Site Context Plan**.

Visual Baseline

6.2 The Site is located on the northern edge of the valley of the River Medway surrounding by rising land to the north, south-east and south. Views from the higher ground to the north towards the Site are generally screened by the intervening landform, vegetation and the railway embankment, as seen on Site Context Photograph 3. From the south, the Site is viewed set against the backdrop of the AONB but within the context of the neighbouring built form of Cuxton (which sits between the site and the AONB), as shown in Site Context Photographs 4, 5 and 6.

Representative Views Towards the Site

6.3 Views are possible from the A228 Sundridge Road which offer elevated views across the Site towards the high land to the south within the Kent Downs AONB as shown in Site Context Photographs 1 and 2. It is possible to see the sharp fall in landform between the road and the north-western boundary of the Site. Buildings will be seen within these views and will obstruct some of the views towards the south across the river valley.

6.4 Views from many of the PRoW within the AONB to the north are obscured by the large areas of woodland planting. Views towards the Site from the North Downs Way are screened by the woodland planting north of Site Context Photograph 3. Views from PRoW RS371 where is passes through the Ranscombe Farm Country Park, approximately 560m to the north of the Site, are possible but, from this location, the Site is obscured behind the fall in the land and the intervening housing, (See Site Context Photograph 3).

6.5 The Site is visible within views from the AONB to the south of the River Medway, as shown on Site Context Photographs 4, 5 and 6. It is possible to see the raised car platform in the northern corner of the Site and the covered stock yard. From these viewpoints, the Site is viewed set back against and within the context of the adjacent residential development of Cuxton and above the marinas and boatyards.

Issues Arising from the Visual Appraisal

6.6 Views from the AONB to the north, including the Ranscombe Farm Country Park and the North Downs Way are generally obscured by the intervening landform and vegetation. The tops of development within the Site would be visible form limited locations in the south of the AONB

but, from these locations, the development would be visible set back behind and within the context of the existing residential development.

6.7 Views towards the Site are possible from the AONB to the south of the river but, from these locations, the Site forms a minor element within the view and is seen set back against and within the context of the neighbouring residential development to the north and east and behind the industrial and employment uses to the south and east.

7.0 SUMMARY OF OPPORTUNITIES AND CONSTRAINTS TO DEVELOPMENT

7.1 Views towards the Site are possible from the AONB to the south and from the A228 to the immediate north. In addition, glimpsed elevated views are possible from PRoW within the AONB to the north. From the AONB to the north and south, the Site is visible set within the context of the neighbouring built form of Cuxton, nearby industrial and employment uses, and the boatyards along the river.

7.2 In order to break up the mass of built form within views and to aid its sensitive integration into the surrounding landscape, particularly when seen from the AONB to the south, the following key elements and issues should be considered within any future masterplan proposal:

- There is an opportunity to enhance the amenity of the A228 Sundridge Hill through the improved management of the existing vegetation, the planting of new street trees and the incorporation of the footway.
- A wide and robust new vegetation structure should be established along the southern edge to reinforce existing trees and shrubs. This planting would provide a new edge and definition to the Strategic Gap and provide separation from the nature reserves to the south.
- Development should be set back from the southern boundary to further reduce the impact of development within the views from the south.
- Sufficient space should be allowed within the development to incorporate tree planting along the contours. This will break up the mass of the built form and will soften the impact of the development on views from the AONB to the north and from long distance views from the AONB to the south. This planting within the development will also aid the sensitive integration of the development into the landscape of the river valley.

8.0 SUMMARY

Issues Arising from the Policy Baseline

8.1 National and local development policy seeks to protect and enhance the character of the built and natural landscape, including the protection of landscape features and the creation of green infrastructure. Special mention is made to the protection of important trees and hedgerows and their contribution to the wider landscape character.

8.2 The protection of the AONB and its setting is a key theme and, although the Site is not within the AONB, it is within the setting and its impacts on views to and from the AONB must be considered.

8.3 The protection and enhancement of the corridor of the River Medway is a key theme with the desire expressed to improve visual and physical access to the river.

8.4 The protection of the amenity of the Public Rights of Way (PRoW) is stated. Although no PRoW pass through the Site and will not, therefore, be physically impacted upon by the proposals, views from the local PRoW must be considered.

8.5 The Site is located within the Strategic Gap and within the Cuxton Fields Area of Local Landscape Importance. The contribution that the Site makes to those designations must be considered along with the impact of any development on them.

Issues Arising from the Landscape Character Assessments

8.6 The national landscape character assessment identifies the wider area which comprises the Kent Downs AONB, an area of distinct landscapes, historic depth and ancient vegetation. The regional and local character assessments, being at a finer grain, identify the contrasting character of the development along the River Medway, in which the Site is located, and its divergence from the character of the higher land within the AONB.

8.7 The regional and local landscape character assessments identify that the areas including the Site comprise areas of landscape that are in *Very Poor* condition and that there is an action to *Restore and Create*.

8.8 Guidance within the landscape character assessments identifies the importance of vegetation within developments to soften the massing of the built form and to aid the sensitive integration of development into the surrounding landscape when seen in views. This includes the restoration and replacement of native hedgerows and the planting of scrub and trees.

Issues Arising from the Landscape Appraisal

8.9 The Site is an unmanaged area of pastoral land containing a number of derelict or semi-derelict agricultural structures, a single storey residential dwelling and an elevated car platform. It is located on rising ground on the northern edge of the valley of the River Medway and is seen set back against and within the context of the surrounding residential development and within the context of boatyards, the Travellers' site and industrial areas along the course of the river.

8.10 The Site is located within the Cuxton Brickfields ALLI which is described as a visually prominent area maintaining the separation between Cuxton and Strood and forming a green backdrop to the river and a green edge to the AONB. It is also located within the Strategic Gap between Cuxton and Rochester in which development is not permitted if it will reduce the separation of the settlements or degrade the open character of the Strategic Gap.

8.11 The Site does not form the functions of the ALLI and will not be contrary to the purposes of the Strategic Gap as set out within the planning policies identified above as it does not extend further east or south than the neighbouring existing residential development and contains some built structures. It is visible from the southern side of the river but forms a minor element within the view, set back against and viewed within the context of existing residential development to the north and east, and to industrial and employment uses to the south and east.

Issues Arising from the Visual Appraisal

8.12 Views from the AONB to the north, including the Ranscombe Farm Country Park and the North Downs Way are generally obscured by the intervening landform and vegetation. The tops of development within the Site would be visible form limited locations in the south of the AONB but, from these locations, the development would be visible set back behind and within the context of the existing residential development.

8.13 Views towards the Site are possible from the AONB to the south of the river but, from these locations, the Site forms a minor element within the view and is seen set back against and within the context of the neighbouring residential development to the north and east and behind the industrial and employment uses to the south and east.

Conclusion

8.14 The Site is located in an area of very poor quality landscape, comprising industrial, employment and residential development, which creates the character of an urban fringe landscape contrasting with the wider landscape of the Kent Downs AONB.

8.15 Although the Site is located on the edge of the valley of the River Medway and is visible within views from the AONB to the north and south, it is only visible in glimpsed views from the AONB to the north, and is viewed as a minor element set back against and within the context of the neighbouring residential, industrial and employment uses within the lower valley sides.

8.16 The Site is located within the Cuxton Brickfields ALLI and the Strategic Gap but performs a limited function to these designations for the following reasons:

- Development within the Site would not cause the settlement edge to extend further east or south than is currently the case. There is existing development within the eastern end of the Site;
- Development would not bring the settlement edge of Cuxton closer to Rochester or Strood.
- Development within the Site would not reduce the open character of the ALLI as it is set back against and viewed within the context of the neighbouring development.

8.17 The Site is an unmanaged area of partly developed agricultural land in an area of very poor quality landscape and which performs a limited function to the designations within which it is located. **Development within the Site would not cause notable detriment to the functions of the designations if the Site was removed, particularly if the opportunities and constraints identified above are considered within any future development proposals.**

ILLUSTRATIVE MATERIAL

Figure 1: Site Context and Visual Appraisal Plan

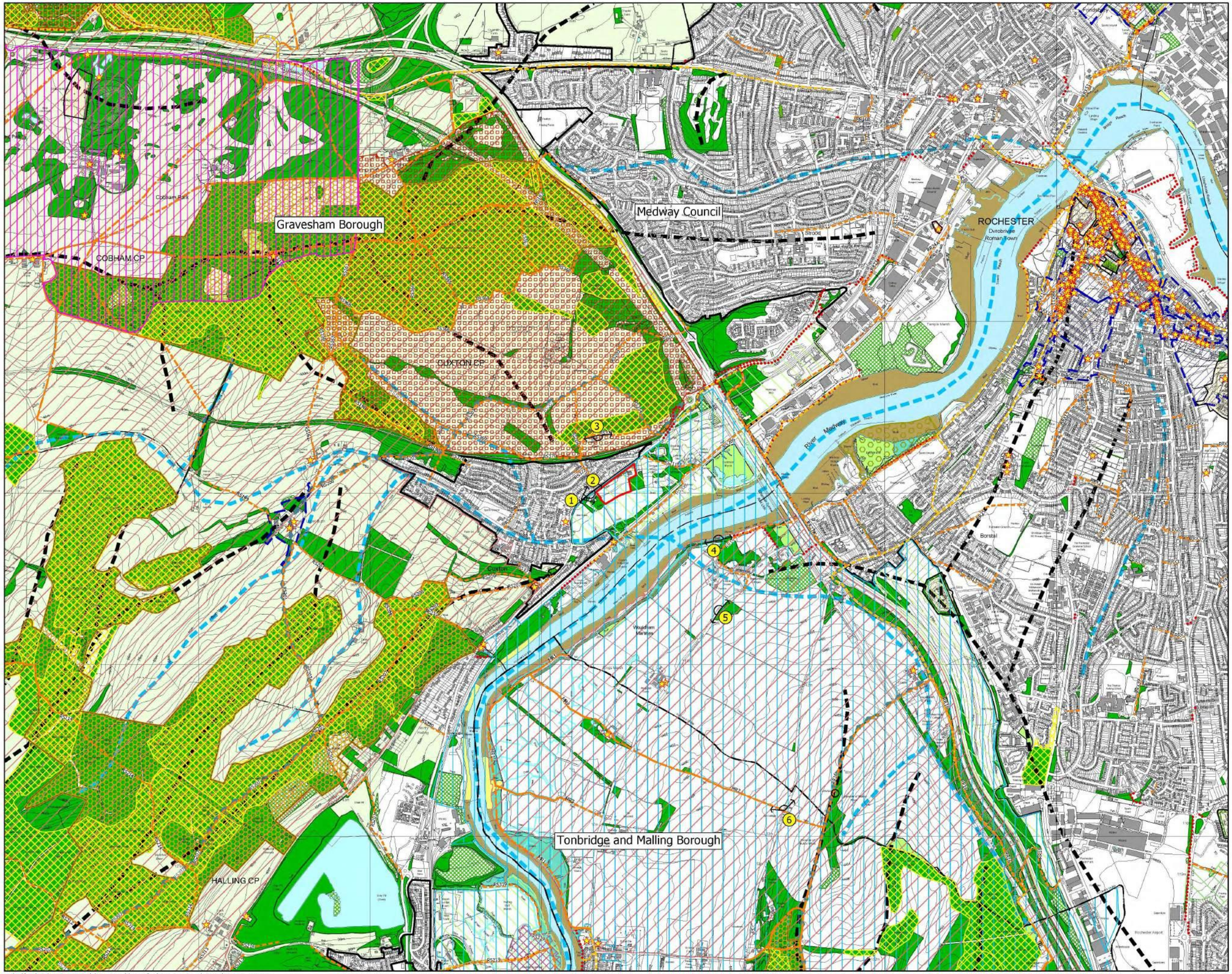
Figure 2: Topographic Features Plan

Figure 3: Landscape Character Areas

Figure 4: Site Appraisal Plan

Site Appraisal Photographs

Site Context Photographs



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Revision	Date	Drn	Ckd
-	-	-	-

N

LEGEND

- Site Boundary
- Existing Woodlands, Copses and Tree Belts ^
- Existing Scrub ^
- Existing Water Courses and Features ^
- Contours/Spot Heights (Metres AOD) ^
- Local Planning Authority Boundary ^
- Ridgelines
- Valleys
- Public Rights of Way *
- Countryside Rights of Way Access Areas #
- Sustrans Cycle Route +
- Cycle Route ++
- National Trail # (North Downs Way)
- Listed Buildings ~
- Registered Parks and Gardens ~
- Scheduled Monument ~
- Conservation Area
- Ancient Woodland #
- Sites of Special Scientific Interest #
- Local Nature Reserve #
- Country Park # (Ranscombe Farm)
- Green Belt ^^
- Kent Downs Area of Outstanding Natural Beauty #

Local Plan Policies **

- Boundary of Urban Area / Rural Settlement
- Strategic Gap (Policy BNE 31)
- North Kent Marshes Special Landscape Area (Policy BNE33)
- Areas of Local Landscape Importance (Policy BNE34)

Sources:
^ OS Mapping
# Natural England GIS Data Set
~ Historic England National Monument Record GIS Data Set
* Medway Council PRoW GIS Data/Kent County Council PRoW Online Map
Sustrans National Cycle Network GIS Data
++ Department of Transport (DoT) GIS Cycle Network Data
** Department for Communities and Local Government GIS Data
Medway Local Plan, May 2003 / Tonbridge and Malling Local Development Framework, May 2012 / Gravesham Local Plan Core Strategy Sept. 2014

Data collated for constraints and analysis mapping is based on publicly available sources at the time of preparation inserted using the British National Grid and may itself not be accurate. Barton Willmore shall not be liable for the accuracy of data derived from external sources.

FIGURE 1

Project
Land South of Sundridge Hill, Cuxton

Drawing Title
Site Context Plan

Date	Scale	Drawn by	Check by
17.03.2017	1:10,000 @A1 1:20,000 @A3	MK	ET
Project No	Drawing No		Revision
25973	L1		-

0 100 200 300 400m

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LEGEND

- Site Boundary
- Existing Water Courses and Features
- Contours/Spot Heights (Metres AOD)
- Ridgelines
- Valleys

Elevation (Metres AOD)

- 155 to 165
- 145 to 155
- 135 to 145
- 125 to 135
- 115 to 125
- 105 to 115
- 095 to 105
- 085 to 095
- 075 to 085
- 065 to 075
- 055 to 065
- 045 to 055
- 035 to 045
- 025 to 035
- 015 to 025
- 005 to 015
- 0-5 to 005

Source:
OS Mapping

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COBHAM CP

CUXTON CP

HALLING CP

ROCHESTER

Cobham Park

Cuxton

Borstal

River Medway

FIGURE 2

Project
Land South of Sundridge Hill, Cuxton

Drawing Title
Topographical Features Plan

Date	Scale	Drawn by	Check by
17.03.2017	1:10,000 @A1 1:20,000 @A3	NK	
Project No	Drawing No		Revision
25793	L2		-

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31:25000-25\6\25000-25\6\25973 – Land South of Sundridge Hill, Cuxton\04 - Design & Realities\Landscape\25973 L2 Topographical Features Plan.dwg - A1

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Revision | Date | Drn | Ckd

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LEGEND

Site Boundary

National Character Area Profiles #

- Area 113, North Kent Plain
- Area 119, North Downs

County Character Areas (Kent) *

- Cobham: West Kent Downs
- Kent Downs - Medway, Western & Eastern Scarp
- Luddesdown: West Kent Downs
- Medway Valley Lower
- Nashenden Valley: Mid Kent Downs
- Shorne
- The Eastern Scarp: Medway
- The Western Scarp: Medway

Medway Landscape Character Areas +

- Character Area Boundary

Character Areas:

- 30 Horsted Valley
- 32 Nashenden Scarp
- 33 Nashenden Valley
- 34 Wouldham Scarp East
- 35 Wouldham Marshes
- 36 Cuxton Scarp Foot
- 37 Halling Marshes
- 40 Halling Scarp West
- 41 Bush Valley and Dean Farm
- 42 Ranscombe Farm

Sources:

Natural England GIS Data Set
* Kent County Council, Landscape Character Assessment 2004
+ Medway Council Landscape Character Assessment 2011

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FIGURE 3

Project
Land South of Sundridge Hill, Cuxton

Drawing Title
Landscape Character Plan

Date	Scale	Drawn by	Check by
17.03.2017	1:10,000 @A1 1:20,000 @A3	MK	
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-	-	-	-

LEGEND

N

- Site Boundary
- Existing Water Courses and Features ^
- Contours/Spot Heights (Metres AOD) ^
- Public Rights of Way *
- Sustrans Cycle Route +
- Cycle Route ++
- National Trail # (North Downs Way)
- Listed Buildings ~
- Ancient Woodland #
- Country Park # (Ranscombe Farm)
- Green Belt ^^
- Kent Downs Area of Outstanding Natural Beauty #

Local Plan Policies **

- Boundary of Urban Area / Rural Settlement
- Strategic Gap (Policy BNE 31)
- Areas of Local Landscape Importance (Policy BNE34)
- Location of Photographic Viewpoints (Site Appraisal Photographs: A-D)

Sources:
^ OS Mapping
# Natural England GIS Data Set
~ Historic England National Monument Record GIS Data Set
* Medway Council Rmoh GIS Data/Kent County Council Rmoh Online Map
+ Sustrans National Cycle Network GIS Data
++ Department of Transport (DoT) GIS Cycle Network Data
^^ Department for Communities and Local Government GIS Data
** Medway Local Plan, May 2003 / Tonbridge and Malling Local Development Framework, May 2012 / Gravesham Local Plan Core Strategy Sept 2014

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FIGURE 4

Project
Land South of Sundridge Hill, Cuxton

Drawing Title
Site Appraisal Plan

Date	Scale	Drawn by	Check by
17.03.2017	1:1,250 @A1 1:2,500 @A3	MK	ET
Project No	Drawing No		Revision
25793	L3		-

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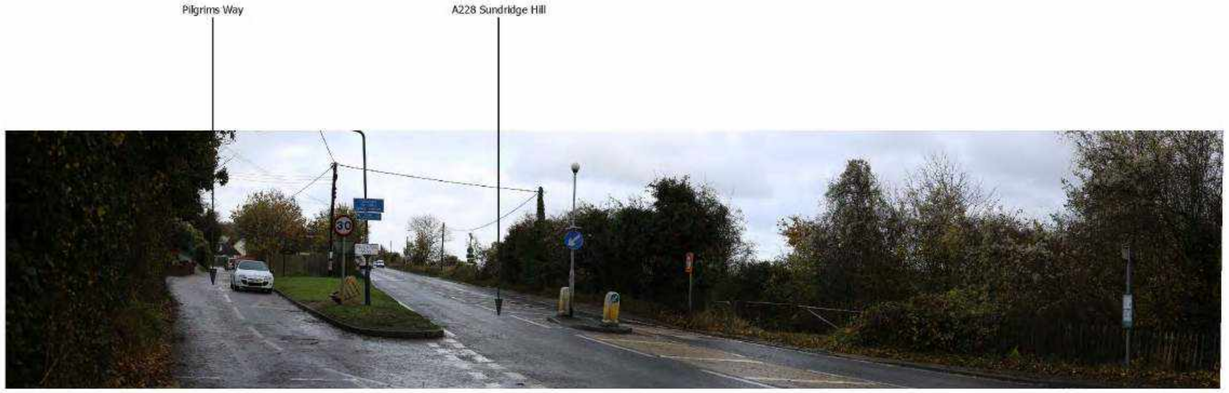
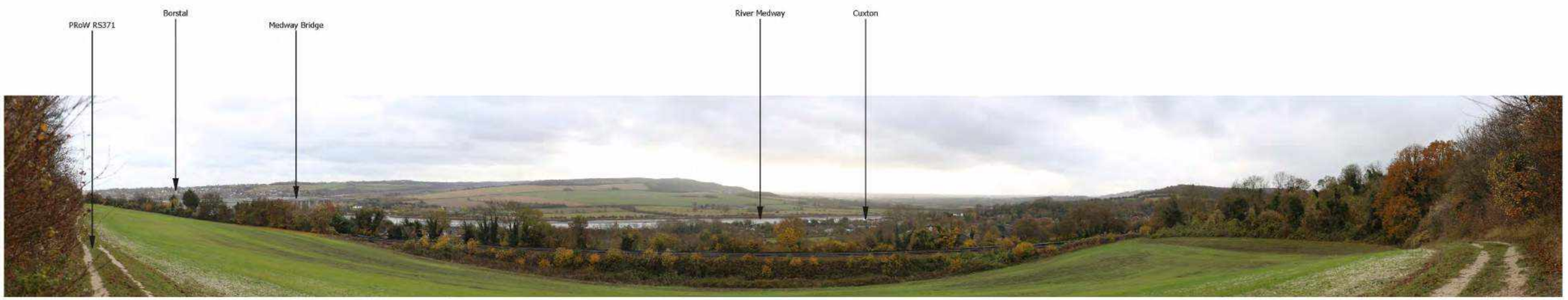


SITE CONTEXT PHOTOGRAPH 1: VIEW FROM JUNCTION OF A228 SUNDRIDGE HILL AND PILGRIMS WAY
Distance: 80m
Elevation: 12.5m AOD

SITE CONTEXT PHOTOGRAPH 2: VIEW FROM A228 SUNDRIDGE ROAD
Distance: 20m
Elevation: 11.3m AOD



SITE CONTEXT PHOTOGRAPH 3: VIEW FROM PROW RS371
Distance: 250m
Elevation: 55.6m AOD

LAND SOUTH OF SUNDRIDGE HILL, CUXTON

SITE CONTEXT PHOTOGRAPHS: 1 - 3

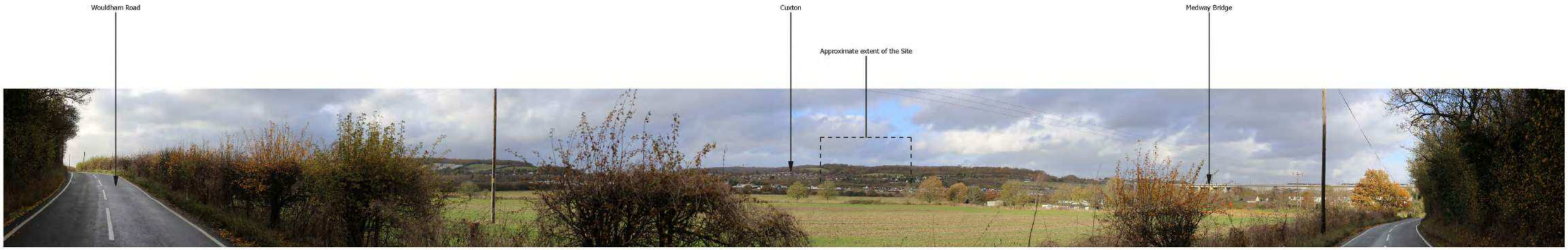
RECOMMENDED VIEWING DISTANCE: 20CM @A1

DATE TAKEN: NOV 2016

PROJECT NUMBER: 25973

BARTON WILLMORE

SITE CONTEXT PHOTOGRAPH 4: VIEW FROM PROW RR14
Distance: 0.53km
Elevation: 2.9m AOD



SITE CONTEXT PHOTOGRAPH 5: VIEW FROM WOULDHAM ROAD
Distance: 0.84km
Elevation: 9.3m AOD

SITE CONTEXT PHOTOGRAPH 6: VIEW FROM JUNCTION OF PILGRIMS WAY AND PROW MR2
Distance: 2.05km
Elevation: 56.4m AOD

LAND SOUTH OF SUNDRIDGE HILL, CUXTON

SITE CONTEXT PHOTOGRAPHS: 4 - 6

RECOMMENDED VIEWING DISTANCE: 20CM @A1

DATE TAKEN: NOV 2016

PROJECT NUMBER: 25973

BARTON WILLMORE

SITE APPRAISAL PHOTOGRAPH A:

SITE APPRAISAL PHOTOGRAPH B:

SITE APPRAISAL PHOTOGRAPH C:

SITE APPRAISAL PHOTOGRAPH D:

LAND SOUTH OF SUNDRIDGE HILL, CUXTON

SITE APPRAISAL PHOTOGRAPHS: A - D

RECOMMENDED VIEWING DISTANCE: 20CM @A1

DATE TAKEN: NOV 2016

PROJECT NUMBER: 25973

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APPENDICES

Appendix A.1: Extracts from Published Landscape Character Assessments

National Character Area profile:

119. North Downs

NATURAL ENGLAND

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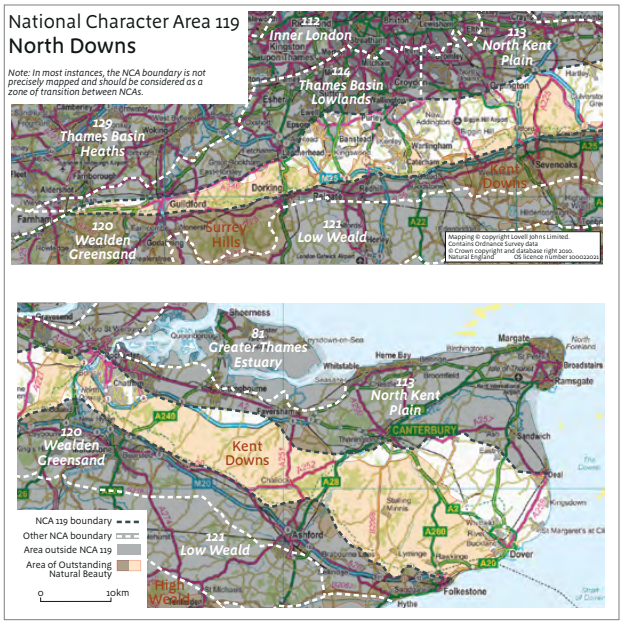
Summary

The North Downs National Character Area (NCA) forms a chain of chalk hills extending from the Hog's Back in Surrey and ending dramatically at the internationally renowned White Cliffs of Dover. The settlement pattern is characterised by traditional small, nucleated villages, scattered farms and large houses with timber framing, flint walls and Wealden brick detailing. Twisting sunken lanes, often aligned along ancient drove roads, cut across the scarp and are a feature of much of the dip slope. The Kent Downs and Surrey Hills Areas of Outstanding Natural Beauty designations are testament to the scenic qualities and natural beauty of the area.

Agriculture is an important component of the landscape, with variations in soils supporting mixed farming practices where arable, livestock and horticulture have co-existed for centuries. The woodlands, many of which are ancient, are a prominent feature of the landscape, yet their ecological value has suffered in recent years due to a reduction in active management, particularly of mixed coppice, since the 1990s. Two Special Areas of Conservation (SAC) are designated for their rare woodland compositions. Chalk grassland is particularly notable, with seven SAC designated for chalk grassland interest including outstanding assemblages of rare orchids. The chalk downland habitats support rare species, including the late spider orchid – wholly restricted to Kent – and the black-veined moth and straw belle moth which are currently found only within the North Downs.

The North Downs are cut by the valleys of the Stour, Medway, Darent, Wey and Mole with their associated wetland habitats. The chalk aquifer of the North Downs is important for supplying water within Kent and to London.

The coast is of international significance with an SAC designation due to the presence of rare maritime cliff communities found within the cliff face and on cliff-tops. Two stretches of the coast are recognised as Heritage Coast: South Foreland and Dover to Folkestone. An outstanding range of historical and geological features are found along the coast, including Dover Castle and the White Cliffs with their strong cultural associations. Other historical features, including numerous Scheduled Ancient Monuments and buildings dating from the medieval period, are scattered throughout.



Click map to enlarge; click again to reduce.

More urban-fringe influence and modern development is associated with the land fringing Croydon, Purley and south London in the western part of the downs, with Dorking, Redhill and Guildford located on the fringes of the NCA. In the east, Dover is the main settlement, but the Medway towns of Rochester and Chatham and the town of Folkestone also lie on the periphery of the NCA. Other towns, including Maidstone, Ashford and Sevenoaks, and the city of Canterbury, although within adjacent NCAs, lie close to the boundary. Views from the eastern scarp are dominated by generally undeveloped landscapes much valued by visitors, with outstanding views across the Vale of Holmesdale to the Weald and from many parts of the downs to France. These views are affected to varying degrees by the Channel Tunnel terminal development and the M25 and M20 corridors.

Chalk grassland is an important component of the North Downs NCA supporting a range of wildlife.

Development pressures and agricultural practices continue to be forces for change throughout the NCA; high-quality and well managed green infrastructure both within and surrounding the NCA could help to service the demands of a growing population, a changing climate and increased pressures on natural resources, including the chalk aquifer, critical for water provision. Opportunities to create more robust and resilient ecological networks across the agricultural landscape should be maximised, working in partnership to secure positive environmental outcomes. The natural and cultural assets of the NCA support food production, regulation of water and soils, biodiversity, recreation, tranquillity, sense of place and sense of history.

Statements of Environmental Opportunity

- **SEO 1**: Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations.

- **SEO 2**: Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs, for their internationally and nationally important habitats and species, cultural heritage and recreational value and to help to deliver climate change mitigation and adaptation. Seek opportunities to establish local markets for timber and biomass to support the active management of local woods, while recognising their contribution to sense of place, sense of history and tranquillity.

- **SEO 3**: Manage and enhance the productive mixed farming landscape of the North Downs and the mosaic of semi-natural habitats including the internationally important chalk grassland. Promote sustainable agricultural practices to benefit soils, water resources, climate regulation, biodiversity, geodiversity and landscape character while maintaining food provision.

- **SEO 4**: Plan to deliver integrated, well-managed multi-functional green space in existing and developing urban areas, providing social, economic and environmental benefits and reinforcing landscape character and local distinctiveness, particularly on or alongside the boundaries of the designated landscapes within the North Downs.

Children enjoy the extensive views from Wye NNR across adjoining NCAs. The NCA offers opportunities for access and education.

Description

Physical and functional links to other National Character Areas

The North Downs National Character Area (NCA) borders the Wealden Greensand NCA to the south, while to the north it borders the Thames Basin Lowlands NCA between Farnham and Purley, and the North Kent Plain NCA in west, mid and east Kent. The scarp forms a defining feature along the length of the NCA and panoramic views provide links with adjoining NCAs and beyond. Views across London, the Thames Estuary and to the south help provide the context and setting of this NCA.

The steep scarp slope provides extensive views over adjacent NCAs as shown here in Surrey.

The catchments of the rivers Wey, Mole and Darent drain through valleys dissecting the downs from the Wealden Greensand in the south to the Thames in the north, while further east the River Medway runs north to the Thames Estuary and the Stour runs north-east to the Kent coastline. Flooding is an issue along localised stretches of the rivers and activities within the NCA may have the potential to exacerbate or alleviate downstream flooding in adjacent NCAs. The chalk bedrock supports a principal aquifer which supplies water to both London and Kent. Spring flow from the Chalk is an important feed for the internationally designated habitats of the north Kent marshes and the Thames Estuary.

Coastal processes link NCAs and the construction of harbours at Dover and Folkestone has prevented any continuing sediment transport around South Foreland, but there is a moderate northwards movement of shingle into the North Kent Plain NCA coast. The role of this sediment supply in the development and denudation of beaches has a critical influence on the rate of coastal erosion. The proximity of this NCA to mainland Europe is notable, with the significant activity at the Port of Dover allowing for the passage of goods and people between England and the rest of Europe.

The M20 runs from Folkestone and Ashford along the southern boundary of the NCA until it cuts across to London. The M2/A2 skirts the northern boundary, connecting Dover and Canterbury to Chatham and south and east London. High Speed 1 (the Channel Tunnel Rail Link) has reduced the travel time by rail between Dover and London.

Key characteristics

- Cretaceous Chalk forms the backbone of the North Downs. A distinctive chalk downland ridge rises up from the surrounding land, with a steep scarp slope to the south providing extensive views across Kent, Surrey and Sussex and across the Channel seascape to France.
- The broad dip slope gradually drops towards the Thames and the English Channel, affording extensive views across London and the Thames Estuary. The carved topography provides a series of dry valleys, ridges and plateaux.
- Chalk soils are predominant across the NCA but the upper part of the dip slope is capped by extensive clay-with-flint deposits. Patches of clay and sandy soils also occur with coombe deposits common in dry valleys.
- The North Downs end at the dramatic White Cliffs of Dover, one of the country's most distinctive and famous landmarks. Most of the coast between Kingsdown and Folkestone is unprotected, allowing for natural processes. The cliffs are home to internationally important maritime cliff-top and cliff-ledge vegetation.
- The area is cut by the deep valleys of the Stour, Medway, Darent, Wey and Mole. The river valleys cut through the chalk ridge, providing distinctive local landscapes which contrast with the steep scarp slope.
- The south-facing scarp is incised by a number of short, bowl-shaped dry valleys, cut by periglacial streams and often referred to as combes. The undulating topography of the dip slope has also been etched by streams and rivers, today forming dry valleys, some of which carry winterbournes that occasionally flow in the dip slope, depending on the level of the chalk aquifer.

The fertile and lighter soils of the footslopes and valley bottoms support arable farming.

Key characteristics continued

- The footslope of the escarpment supports arable cropping, the dominant land use within the NCA. In the east, the richer, loamy soils of the lower dip slope support large tracts of mixed arable and horticultural production.
- Woodland is found primarily on the steeper slopes of the scarp, valley sides and areas of the dip slope capped with clay-with-flints. Well-wooded hedgerows and shaws are an important component of the field boundaries, contributing to a strongly wooded character. Much of the woodland is ancient.
- Tracts of species-rich chalk grassland and patches of chalk heath are important downland habitats and of international importance.
- Ancient paths, drove roads and trackways, often sunken, cross the landscape and are a distinctive feature of the dip slope. Defensive structures such as castles, hill forts and Second World War installations, and historic parks, buildings and monuments are found throughout.
- Small, nucleated villages and scattered farmsteads including oasts and barns form the settlement pattern, with local flint, chalk and Wealden brick the vernacular materials.
- In the western part of the area, around and to the west of Sevenoaks and into Surrey, there is increased urban development.

Statements of Environmental Opportunity

SEO 1: Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations.

For example, by:

- Conserving the downland settlement pattern of nucleated villages, irregular fields and scattered farmsteads linked by a network of narrow, winding lanes and characteristic sunken 'hollow ways' through appropriate planning policies and development management, and in particular promotion of Kent Downs and Surrey Hills Area of Outstanding Natural Beauty (AONB) design guides.
- Protecting from damage the rich and varied heritage of historic buildings, settlements and sites dating from the prehistoric period onwards, including iron-age hill forts, defensive coastline installations and traditional farmsteads, and improving management, access to and sensitive interpretation of historic features.
- Improving management of historic parklands and any associated key habitats such as ancient and veteran trees, ancient woodland and species-rich grassland. Works such as successional planting, coppicing or reversion of arable back to grassland should be prioritised and informed by assessment of the historic design and significance of parkland.

Continued on next page...

The NCA has a number of heritage assets including the megalithic remains at Kit's Coty as shown here.

SEO 1: Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, including the long-established settlement pattern, ancient routeways and traditional buildings. Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations.

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- Conserving and appropriately managing ancient trackways such as the North Downs Way National Trail which links Dover and Guildford, and the Pilgrims' Way which links Canterbury and Winchester; and working across sectors to promote and strengthen the network through high-quality interconnecting routes, increasing the benefits of these routes for biodiversity, health and local businesses.
- Using AONB design guidance and understanding of the area's traditional and historic architecture, and its distinct local materials (flint, chalk, brick, timber and tiles) and patterns of settlement, to inform appropriate conservation and use of historic buildings, and to plan for and inspire any new development which makes a positive contribution to local character.
- Seeking opportunities to minimise the impact of new developments, including visual intrusion, disturbance and noise, on the tranquillity and beauty of the countryside. Green infrastructure planning should be maximised for its multiple benefits and best practice should be shared locally.
- Working in partnership with Kent Downs and Surrey Hills Areas of Outstanding Natural Beauty to identify management opportunities in accordance with their respective management plans[12].
- Seeking to increase awareness and maximising the potential of the various historic, natural and cultural assets, improving access to and interpretation of sites and features, including the world-renowned White Cliffs of Dover, as a platform for enhanced education and to enthuse local communities, linking them with their local geology, wildlife and cultural and historic environments. At the same time there is a need to recognise and manage the impact of increased visitor numbers on sensitive sites.

[12] *Surrey Hills Area of Outstanding Natural Beauty Management Plan 2009–2014*, Surrey Hills Board (2009); *Kent Downs Area of Outstanding Natural Beauty Management Plan 2009–2014*, Kent Downs AONB Unit (2009)

SEO 2: Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs, for their internationally and nationally important habitats and species, cultural heritage and recreational value and to help to deliver climate change mitigation and adaptation. Seek opportunities to establish local markets for timber and biomass to support the active management of local woods, while recognising the contribution to sense of place, sense of history and tranquillity.

For example, by:

- Supporting the sustainable re-establishment of coppice management to appropriate areas of woodland, where this will improve biodiversity interest while providing a local resource including wood fuel.
- Seeking to work in partnership to aid co-ordinated conservation management, particularly where there are woodlots. Managing all woodlands as single entities aimed at benefiting the whole wood, its biodiversity, its contribution to landscape character, and the provision of community and other benefits where appropriate.
- Supporting existing markets and encouraging new markets for the products of native woodland underwood and timber. This will provide the market driver to encourage and maintain viable and sustainable woodland management.
- Encouraging the positive management of open habitats and spaces, such as rides and glades, for their landscape, biodiversity and cultural benefits, especially where they will support rare species, such as Duke of Burgundy fritillary. Maintaining an appropriate balance of well-structured woodland and transitional and open habitats will produce a mixed structure of tree species and stand age, benefiting biodiversity.
- Working to increase public understanding and appreciation of the importance of woodlands, including the impacts of harmful activities and inappropriate management. Utilising the woodland resource for education, appropriate recreation and research, furthering our understanding of the role of woodlands in a changing climate.
- Ensuring that the North Downs Woodland and Mole Gap to Reigate Escarpment Special Areas of Conservation attain and retain favourable conservation status as an element of the Natura 2000 network. Also, ensuring that the woodland Sites of Special Scientific Interest are in favourable condition and that local sites are in positive management.
- Protecting and expanding the existing urban tree resource, recognising its multiple benefits, including its role in climate change mitigation.
- Targeting the expansion and re-linking of existing semi-natural woodland, benefiting biodiversity and landscape, where it can re-connect isolated woodland blocks and help to prevent soil erosion and nutrient run-off (where this does not result in loss of existing important habitats such as chalk grassland). Taking into account future climate change, looking to enhance the coherence and resilience of woodlands, hedgerows, trees and other habitats to create robust networks of woody and open semi-natural habitats.
- Creating new areas of broadleaved woodland, where it accords with the landscape character of the area, helping to maintain tranquillity while providing a local recreational resource and further source of wood fuel and high-quality timber products.
- Encouraging conservation management of game woodlands as promoted by the British Association for Shooting and Conservation and sharing best practice locally, as shown in the Kent Downs AONB game management guidance.

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SEO 2: Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs, for their internationally and nationally important habitats and species, cultural heritage and recreational value and to help to deliver climate change mitigation and adaptation. Seek opportunities to establish local markets for timber and biomass to support the active management of local woods, while recognising the contribution to sense of place, sense of history and tranquillity.

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- Recognising and managing the risks of tree diseases and woodland pests, taking co-ordinated conservation action to safeguard the woodland resource, and considering the close vicinity to the continent from where diseases can spread.
- Conserving ancient and veteran trees within the landscape for the benefit of species that depend upon them, and for their heritage value and contribution to a sense of place. Planning and implementing a programme to develop the next generation of hedgerow trees and future veterans, choosing appropriate species and taking into account their resilience to climate change.
- Ensuring that populations of deer are managed to reduce the damage caused to the natural regeneration of woodland (and woodland flora). High populations will have major impacts on ancient woodland flora and coppice management.

Wood chipping in action. The woodland resource provides an excellent opportunity for biomass energy in the form of wood chip.

SEO 4: Plan to deliver integrated, well-managed multi-functional green space in existing and developing urban areas, providing social, economic and environmental benefits and reinforcing landscape character and local distinctiveness, particularly on or alongside the boundaries of the designated landscapes within the North Downs.

For example, by:

- Creating high-quality, well-managed accessible natural green space within and surrounding urban areas as part of comprehensive green infrastructure planning, providing significant local recreational opportunities that meet the Accessible Natural Greenspace Standard (ANGSt) while benefiting health and wellbeing and providing habitats and green space linkages, increasing the permeability of the urban landscape to biodiversity and building on existing networks.
- Improving water quality by careful design to address the potential issues of pollution and contamination by run-off and leakage through water pathways. Creating new wetlands as part of sustainable drainage systems, helping to provide flood alleviation. In addition, creating extensive reedbeds where potentially polluted waters enter these wetlands to filter out pollutants and provide benefits for water quality.
- Promoting the use of London's existing frameworks to inform the design of new landscapes associated with new development and green infrastructure within Greater London, including implementation of the All London Green Grid.
- Maintaining the existing downland character as a setting for new development (where allocated and approved), ensuring that this does not impact adversely on the special qualities of the designated landscapes, conserving the tranquillity and geodiversity of the area through planning and sympathetic design, in particular minimising light spill and traffic noise to retain the 'undisturbed' feel of parts of the NCA and enhancing local landscape character.
- Promoting the use of sustainable and locally sourced materials, vernacular building techniques and styles, and existing landscape character to inform design and ensure integration with the surrounding landscape.
- Targeted planting of woodland and trees surrounding existing and new development and major transport corridors where appropriate within the existing context, helping to provide climate change adaptation and mitigation, flood alleviation, landscape character and biodiversity benefits.
- Identifying opportunities for community involvement in projects through design and implementation to foster ownership, involvement and support of local communities and to help to create environments which improve the lives, livelihoods and health of local people and communities.
- Planning schemes which connect to or incorporate an existing or planned low carbon transport network, such as walking and cycling routes.
- Developing a strategic approach to green infrastructure across the NCA and its boundaries to take account of the existing urban areas and proximity of the NCA to areas of growth, planning a network of green spaces in the urban and urban fringe areas and adjacent countryside.

Supporting document 2: Landscape change

Recent changes

Trees and woodlands

- Opportunities for further strengthening of woodland character were identified by the Countryside Quality Counts research (2003); in particular, extensive areas of broadleaved woodland, especially in the west, mid and east Kent Downs were identified as in need of active management, especially by rotational coppice.

- There has been an increased interest in wood fuel initiatives within the NCA and particularly in both the Kent and Surrey AONB with projects aiming to create local markets for wood fuel. These have the potential and are already helping to get unmanaged woodlands back into management with re-establishment of coppicing cycles[13]. There appears to have been an uplift in wood fuel markets. In addition, there has been resurgence in interest in other wood products such as those derived from cleft chestnut.

- Tree diseases and pests are an increasing threat to the woodlands of the NCA including the ash dieback, oak processionary moth and Phytophthora ramorum.

- While it is difficult to quantify there is a perception that deer populations have increased. This can have implications for native woodland flora and for re-establishing and maintaining coppice cycle in woodlands, due to browsing of re-growth.

Boundary features

- The total length of countryside stewardship capital agreements between 1999 and 2003 was equivalent to around 3 per cent of the total estimated NCA boundary length of 8,613 km. As of March 2011, 864 km of hedgerows were managed under environmental stewardship schemes, equivalent to 10 per cent of the total estimated NCA boundary length. It should be noted that CSS options related to restoration and creation of boundary features, whereas environmental stewardship has included maintenance options on existing hedgerows.

- Some hedgerows have developed gaps, become overgrown or been lost with corresponding impacts on local landscape character.

- Roadside boundaries are notable given the number of flower-rich roadside verges, these are a particular feature in the NCA and conservation efforts have resulted in new roadside verge habitats being created and appropriately managed in the last 10 years.

[13] Kent Downs Area of Outstanding Natural Beauty, Management Plan 2009 – 2014, Surrey Hills Area of Outstanding Natural Beauty, Management Plan, 2009- 2014

Agriculture

- The landscape's mixed farming character is supported by figures on farm type from recent agricultural data which shows a mix of livestock, cereals and horticultural holdings. Between 2000 and 2009 there were reductions in the area of land recorded under fruit, cash roots, stock feed, vegetables and grass and uncropped land but with increases in oilseeds and other arable crops. There was also a corresponding reduction in the numbers of livestock recorded during this period.

- While data and evidence is currently lacking at the NCA level, it is likely that changes in horticultural production methods such as the use of polytunnels has increased, driven by market changes in the United Kingdom soft fruit sector.

- In the last 10 years there have been increased opportunities through agri-environment schemes to integrate a range of conservation measures into the farmed landscape. These have included habitats for rare arable plants, farmland bird options and management of chalk and neutral grasslands.

- Highly convenient and commutable distances to London have put pressure on land and house prices, particularly in Surrey. In some instances a move towards recreational land uses are replacing agricultural uses in parts of the NCA.

Settlement and development

- Countryside Quality Counts research assessed the changes in settlement and development between 1998 and 2003. At this time the area was considered to have a high share of the national build outside of existing urban and fringe areas. There was evidence of expansion into the peri-urban around Caterham along with more dispersed settlement along the M25 corridor, especially south of Biggin Hill, around Swanscombe and Northfleet, along the A228 south of Rochester and the A249 and around Hawkinge in the east. It was also considered that development associated with the M2 had impacted locally.

- Since 2003 development has continued to have an impact with significant new developments completed or proposed within or on the boundaries of the NCA, including at Ashford, Thames Gateway, Maidstone, Guildford, Purley, South London and Dover where major housing allocation is identified in the Whitfield urban expansion. This NCA is subject to the impacts of significant development pressures outside the NCA boundaries and within its setting.

- High Speed 1, the first high speed rail project in the UK, was fully completed in 2007 and runs through part of the NCA. The route connects London with the Channel Tunnel. Other improvements to the existing road network have also taken place, with the M20, M25 and M2 all running through the NCA at some point.

- Dover Harbour Board operates Europe's biggest roll-on roll-off ferry port for both freight and passenger traffic. There are proposals for expansion in capacity[14] .

Semi-natural habitat

- Agri-environment schemes have resulted in the enhancement and creation of semi-natural habitats. Most notable for this NCA is the maintenance, restoration and creation of species rich semi-natural grassland associated with the calcareous grassland resource. Other areas of grassland interest will have been captured under HLS options for target species and entry level options where grasslands are managed under low and very low inputs.

[14] Local Transport Plan for Kent 2011 – 2016, Kent County Council

- Of the 51 SSSI, 96.7 per cent are in favourable or unfavourable recovering position. This percentage has increased as a result of continued efforts to improve favourability of sites.

- Partnership work over recent years has been successful in securing habitat benefits. These include restoration and re-creation of chalk and neutral grasslands with wildflower hay/seed spreading and landscape scale approaches to habitat restoration. Landscape Partnership Schemes have had a positive impact in the area securing benefits for a range of habitats including chalk grassland and grazing marsh.

- The outputs from the ARCH (Assessing Regional Habitat Change) project should be used for a review of the habitats in Kent and the most recent habitat data and trends. Please note this information is only available for Kent and does not include areas of the NCA that fall into Surrey[15].

Historic features

- In 1918, around 7 per cent of the NCA was historic parkland (in terms of the share of the resource the area was ranked 9). An estimated 52 per cent was lost by 1995 with about 25 per cent of the remaining parkland covered by a Historic Parkland Grant. In 2003 around 30 per cent was included within agri-environment schemes. Parkland has been identified as a priority within this NCA based on original extent within the landscape and subsequent rates of loss[16].

- In 2006 it was recorded that there is a high proportion of listed working farm buildings converted to non-agricultural use (41.9 per cent, the national average being 32 per cent)[17] in this National Character Area.

- Since the introduction of Environmental Stewardship (ES) schemes in 2005, options and standard capital items have been targeted at historic features and include the restoration and maintenance of parkland including the restoration of parkland structures such as ice houses, parkland railing and buildings. Parklands have also been captured under Entry Level Stewardship (ELS) or Countryside Stewardship (CSS) options, although those options may not always directly relate to management of the historic aspects of the parkland. Gains have also been made through taking archaeological features out of cultivation and securing low depth cultivations on archaeological features.

- Two sites within the NCA (Belvedere, and Western Heights fortifications) have both been identified on the Priority Heritage at Risk Sites 2012[18].

- The NCA has a number of heritage assets. Sites within the NCA are identified on the Heritage at Risk Register[19] with neglect, decay or inappropriate change still presenting threats to heritage assets. However, a number of sites which were previously identified on the register have been restored under Environmental Stewardship.

[15] For more information on the ARCH project visit URL: http://www.archnature.eu/
[16] English Heritage, 2006
[17] North Downs, Farmstead Character Assessment, English Heritage.
[18] Heritage at risk 2012, Priority Sites, English Heritage URL: http://www.english-heritage.org.uk/publications/priority-har-sites-2012/
[19] Heritage at Risk Register, English Heritage: URL: http://risk.english-heritage.org.uk/register.aspx

Coast and rivers

- Recent data using Water Framework Directive methods indicates that most of the rivers are of moderate ecological status and potential, but notably of poor status in the Great Stour (a Defra priority catchment), while chemical quality is variable[20].

- Samphire Hoe was opened to the public in 1997 and is a new piece of land that was created using spoil from the construction of the Channel Tunnel. It is a 30 ha site at the foot of Shakespeare Cliff surrounded by a protective sea wall. This land has developed in wildlife interest and is a recreational resource.

- Flood defence work is occurring along the coast at Deal with a rock revetment at the Castle end of the beach. Shingle recharge and a low sea wall in the town of Deal are currently underway.

Minerals

- A history of chalk quarrying has had an important impact on the downs scarp face and there are still a number of small-scale quarrying activities in the North Downs. The legacy of past quarrying has left some non-active quarries in the Kent part of the NCA but these are not identified in the Kent Minerals Plan to be reopened. There have been proposals for new sites and the extension of existing sand working sites and primary aggregates within the NCA and its setting in Kent and Surrey. For more information refer to the Kent Minerals Plan[21] and Surrey Minerals and Waste Development Framework[22].

Drivers of change

Climate change

- The UKCP09 climate change projections suggest that by 2050 there may be an increase of winter mean temperature of 2.2°C, an increase in summer mean temperature of 2.8°C and a change in precipitation distribution, with a decrease of 19 per cent in summer and increase of 16 per cent in the winter throughout the south-east (central estimate under a medium emissions scenario, UKCP09)[23].

- The predicted changes in sea levels and increased storminess may lead to accelerated coastal processes and increased erosion at the coast. This could have impacts on biodiversity, geodiversity, recreation and the heritage along the coastline as well as impacts on areas adjacent to the Tidal Medway.

- Summer droughts may lead to an increase in water demand for crop growth and may also affect aquifer recharge, having implications for water resources, especially in meeting the demands of a growing population and maintaining flows of the chalk rivers. Equally, more intense winter rainfall may increase soil erosion and reduce effective rainfall for aquifer recharge, increasing river pollution and sedimentation and increasing stress on already over abstracted aquifers.

[20] River Basin Management Plan, Thames River Basin District, Annex A, Current state of waters, 2009
[21] Kent Minerals and Waste Development Framework, Scheme 2010-2014, Kent County Council: URL http://www.kent.gov.uk/environment_and_planning/planning_in_kent/minerals_and_waste/mineral_sites_document/preferred_options/mineral_sites.aspx)
[22] Surrey Minerals Plan 2011, Core Strategy Development Plan Document, 2011 URL: http://www.surreycc.gov.uk/__data/assets/pdf_file/0004/177259/Adopted-Core-Strategy-Development-Plan-Document.pdf
[23] UK Climate Projections science report: Climate Change projections, 2010

- Changes might affect species migration or local extinction and loss or deterioration of small or isolated habitats such as chalk grassland on the steep sections of the scarp. This may make the re-creation of chalk grassland habitats, particularly on the more gentle slopes of the scarp foot and the less steep sections of the scarp, increasingly important to help mitigate effects of climate change on the steeper south facing slopes.

- The resilience of woodlands and trees in the NCA may be increasingly important as the climate changes, in terms of their role in providing a source of low carbon fuel and in terms of adaptation to and mitigation of climate change. The composition of the woodlands may be affected due to pests and diseases and there may be direct tree loss due to the changing climatic conditions, with impacts on associated woodland biodiversity.

- Climate change may result in changes to the type of crops which are grown with changes in land management in response to climate change potentially impacting on biodiversity and landscape character.

- Water resources within the NCA are likely to be impacted on by future climate change with potential implications for the North Downs chalk aquifer.

- Climate change may result in greater instances of flooding.

- A requirement for a greater proportion of energy generation from renewable sources could result in increased pressure for; wind turbines, either within the NCA or its setting; photovoltaic solar arrays, either within or affecting the NCA's setting; and the growth of biomass crop production.

Other key drivers

- Development pressures offer a challenge but where permitted it will be important to maximise opportunities for landscape and ecological enhancements through delivery of priority habitats and greenspace. The topography of the North Downs means that housing developments or industrial activities may be particularly visible from the escarpment and developments within the setting of both AONB create particular challenges. Well planned green infrastructure which strengthens or restores landscape character alongside an expansion of ecological and environmental functionality, integrated with socio-economic improvement within and reaching out from urban areas can help mitigate climate change and provide other ecosystem benefits for people and biodiversity.

- Major development at Dover including Whitfield Urban expansion, which when complete will include 5,750 new homes and associated infrastructure, including widening of the A2, will increase the impact of the urban fringe on local landscape character In the east. Equally in the west there are significant development pressures in Surrey. Increased development may cause associated urban fringe and suburban pressures including increased traffic and recreational activities on sensitive and vulnerable sites and habitats.

- Continuing conversion of farm buildings to residential and commercial uses is expected especially if there is an increase in farm diversification potentially impacting on sense of place and history.

- The North Downs NCA is particularly close to large centres of population and planned housing developments either within or in adjacent NCAs may generate additional recreational pressures, this provides both challenges but also opportunities for good quality greenspace provision. An integrated approach to recreation management will be required especially to mitigate threats to key biodiversity sites including European sites.

- New markets, changing climate and increased pressure for food production is likely to have an effect on existing agricultural practices and land use. Changes in climate may result in opportunities for the growth of new crops such as vines, especially given the south-east location and topography of the NCA. Changes in horticultural production could also result in changes to the farmed landscape, for example through the increased use of polytunnels or glass houses.

- Landscape-scale partnerships have already delivered benefits for habitats, species and people but there is potential to deliver more and across a larger area to create robust ecological networks and place the NCA in the best place possible to respond to future challenges.

- Any new transport infrastructure which links to existing major route ways, within and adjacent to the NCA may have an impact depending upon the chosen option.

- Future water resource issues are likely to have an impact on the NCA. The chalk aquifer is an important source of water and is likely to come under increasing pressure. It will be important to work in partnership and across sectors to help safeguard the water resources.

- Woodland economics and establishing markets for wood fuel and high quality timber products could be critical for securing sustainable management of the woodland resource. There is potential to manage woodlands for their multiple benefits, addressing the threats of pests, diseases, inappropriate or poorly managed recreation and wood-lotting. Effective management and a co-ordinated approach to woodland management will also help with resilience to climate change.

- Expansion or increase in poorly managed equine developments would have impacts on the NCA. It will be important to promote best practice management guidance.

- The location of this NCA, close to the continent and with good links through the ports with significant trade, travel, tourism and transport connections means that the likelihood of new species being found here and the possibility of some of them proving to be invasive is quite high.

Photo credits

Front cover: Box Hill, on the North Downs Way National Trail with unimproved grassland in the foreground. The NCA is renowned for its far reaching views from the scarp. © Natural England/McCoy Wynne & Associates

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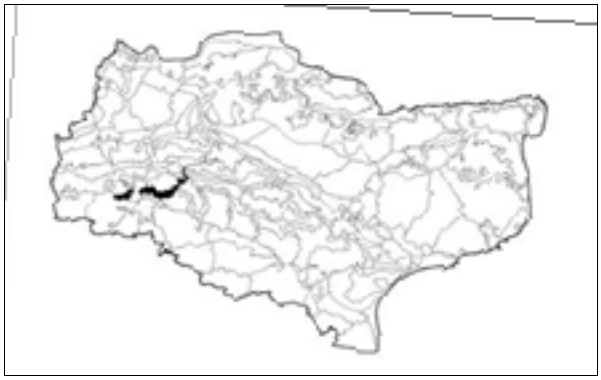
The Landscape Assessment of Kent

October 2004

MEDWAY VALLEY



A corridor of flat, open landscape bordering the river Medway from Penshurst in the south up to Nettlestead close to the Greensand, but one of considerable interest for its complex network of small streams and ditches.

Generally the scene is one of large fields of vegetables, grain and occasional hops, but with pastures and damp copses locally significant. Many hedges have been removed, including those along the roadsides, which can give the landscape an exposed feel. The river can at times be traced in the landscape by the small groups of willow along its edge but many have been removed to aid mechanisation.

Neither woodlands, orchards or settlement are characteristic of the floodplain because of the traditional risk of flooding, although locally these land uses do occur. Standing water is common, both as small ponds, such as those at the East Peckham Site of Nature Conservation Interest (SNCI), and in the large reservoir at Haysden, built for flood alleviation but which is also a haven for overwintering birds.

The functional unity of the landscape is being changed from that of the traditional wet meadows, hedged and grazed, to open, larger fields of leafy vegetables and other arable crops that were once confined to the better drained soils of the Fruit Belt.

Visual harmony is disturbed by the large areas of the monochromatic blue - greens of the vegetable crops with the incomplete or lost hedges creating a neglected air.

Tonbridge has spread mainly on the higher land with better drained soils, to avoid the frequent flooding in the past, leaving many parts of the valley free from development. The town and its suburbs are now protected from flooding by the Haysden reservoir scheme, but the river is still liable to spill outside its valley into the broader floodplain and the Fruit Belt, especially at its junction with the Bourne and Teise.

The suburbs of Tonbridge, the A21 and railway, and lines of pylons sometimes intrude on the flat, rural scene.

next >>

MEDWAY VALLEY

PHOTOGRAPH

CHARACTERISTIC FEATURES

Flat, open, mainly arable landscape.
Few settlements or roads in floodplain due to seasonal flooding.
Historic bridging points.

CONTEXT

Regional: Low Weald

Condition

	low	moderate	high
good	REINFORCE	CONSERVE & REINFORCE	CONSERVE
moderate	CREATE & REINFORCE	CONSERVE & CREATE	CONSERVE & RESTORE
poor	CREATE	**RESTORE & CREATE**	RESTORE

Sensitivity

LANDSCAPE ANALYSIS

Condition

The area of the Medway Valley within the Low Weald is often incoherent as a river floodplain, appearing as a flat, open arable landscape in many areas. It retains an aura of inaccessibility apart from the historic bridging points, but is well-used for industrial and commercial purposes, and gravel workings. Arable fields run to the edge of river banks, and flood defences define the river. There is little transitional land from river to farmland. Where there are commercial properties, these dominate the river bank. Scrub and riparian vegetation grow in a limited natural corridor and in regenerative groups around mineral works.

Sensitivity

In a landscape which historically has little or no settlement, the dominant elements in this landscape are comparatively recent such as commercial buildings, post and wire enclosures and the embanked dual carriageway. The river flows through an unremarkable landform with open views over in cohesive land uses. The tree cover is sparse and this raises the sensitivity of the area to 'moderate'.

LANDSCAPE ACTIONS

Create areas of gentle transition from the river on the lower contours to the rural landscape on the upper contours. Encourage the regeneration of riparian vegetation, especially around junctions of streams and tributaries, allowing some wetland to develop. Encourage sympathetic farming practices especially in areas immediately adjacent to the river.
Restore some natural areas of the river floodplain and tributaries, creating a wider river corridor.
Restore seasonal accessibility to designated areas of the floodplain, possibly in association with the development of commercial land use and natural habitats.
Identify areas of unmanaged land, or land managed unsympathetically to the context of the floodplain, and agree a code of land use.
Create containment to existing urban edges by using riparian landscape elements and existing natural features such as landform and vegetation. Agree a design code for the distinctive new design of built form and flood defence structures.

SUMMARY OF ANALYSIS

Condition **Poor.**

Pattern of elements:	Coherent.
Detracting features:	Some.
Visual Unity:	Coherent.
Cultural integrity:	Poor.
Ecological integrity:	Moderate.
Functional Integrity:	Weak.

Sensitivity **Moderate.**

Distinctiveness:	Indistinct.
Continuity:	Recent.
Sense of Place:	Very Weak.
Landform:	Apparent
Extent of tree cover:	Open
Visibility:	High.

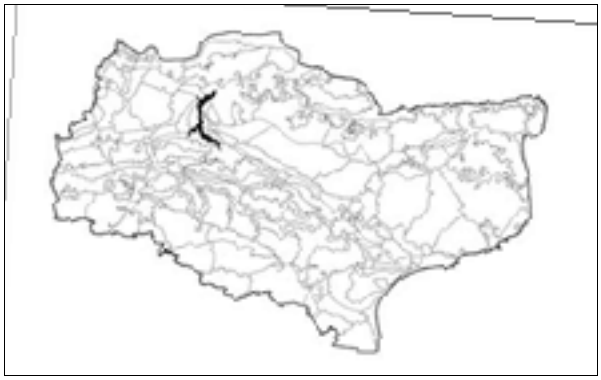
SUMMARY OF ACTIONS

RESTORE AND CREATE.

Create areas of transition from the fluvial to the rural landscape
Create wetland areas
Restore riparian vegetation to riverbanks and at fluvial junctions.
Create a design code for commercial properties and flood defence structures.
Create and restore seasonal accessibility to the floodplain
Create a positive land use code
Restore field boundaries and a cohesive land use to the upper contours
Create a new edge to existing urban areas using riparian elements.

previous <<

MEDWAY VALLEY LOWER



The Medway Valley divides into two distinctive sub-areas as it cuts first through the high Greensand Ridge, producing a narrow, contained valley, then a broader landscape as it crosses the softer Gault Clay vale and on through the chalk.

The latter is the Medway Valley Lower which is essentially a flat landscape developed on the valley alluviums around the meandering river Medway between the tidal lock at Allington on the Maidstone outskirts to Halling downstream. The landscape extends laterally over a broad area around New Hythe and Aylesford defined by the river deposits, but narrows as the Medway cuts through the chalk which encloses the landscape to the north.

Much of the landscape is a rather untidy sprawl of settlements and industry such as Snodland, New Hythe and Forstal that have developed along the river's flanks, most particularly in the west of the valley. It is distinguished by dramatic mineral sites associated with gravel and clay extraction, either still working as at Ham Hill Sandpits, Snodland, or reclaimed as at the lakes at Leybourne. Amongst the enterprises that traditionally used the river, some remain. Many of these are of an industrial nature, such as scrap metal yards, which inevitably detract from the visual quality of the riverside.

The river itself forms an important and distinctive feature within the character area, much of it being either a Site of Special Scientific Interest (SSSI) or a Site of Nature Conservation Interest (SNCI). This includes marshes on the east bank of the Medway at Wouldham, part of which are also in an area of Local Landscape Importance. Here an area of extensive unimproved grassland and reedbeds, divided by dykes, remains under grazing. It is hoped to raise the water levels in some of these dykes to improve their nature conservation value.

At the river's margin, areas of reeds and other common emergents, mudflats and wading birds at low tide contrast strongly with the more industrialised areas to the south.

The lakes at Leybourne are an important site for migrant and breeding birds and are variously used for bird-watching or are stocked for fishermen. On the west bank, the landscape is dominated by housing, industry, pylons and arable farming. Snodland is not distinguished by its architecture and whilst Halling retains an attractive riverside church with long views to the chalk scarp, it is dominated by a mélange of 20th century development. Recent redevelopment of old industrial sites on this bank has intensified the built fabric so that when viewed from the east the impression is of continuous development. Allowance should be made for vegetated buffer zones adjacent to the river, to enhance its aquatic habitats and amenity value.

The quieter stretches of the east bank of the river are used for recreation by children, walkers at the water's edge itself and along the bank-top path that meanders down much of this bank, passing occasional old boats nestling on the peaceful bankside. Pleasure craft occasionally make their way up to Allington lock from the estuary. A general sense of quiet pervades on the river, however, especially at low tide when, for many craft, the river is unnavigable.

Much of the east bank remains a tranquil although degraded landscape. Additional new development is proposed at Peter's Pit, Wouldham and at Eccles. New vehicle and pedestrian bridges are proposed across the river as part of the development brief. The area's current relative isolation is likely to be affected by these proposals.

Recreational pressure may be put on the areas of conservation value. Traffic management measures and accessible public transport may be needed to manage the potential traffic impact on the rural lanes. The development proposals are also likely to be highly visible from the Kent Downs AONB.

A further influence on the river valley landscape would be the imposition of dredging, vegetation clearance and other flood-plain management which may be required around new built development and could be in visual conflict with the local landscape character.

The related aspects of reduced rainfall and increased abstraction of the river water have contributed to the changing face of the lower Medway Valley. Low water levels and variable water quality considerably diminish the amenity and the experience of the waterside and the expansive, spacious tidal flood-plain.

next >>

MEDWAY VALLEY LOWER

PHOTOGRAPH

CHARACTERISTIC FEATURES

Tidal river with well-developed meanders. Residual unimproved grasslands and reedbeds forming important areas for nature conservation. Well developed industrial mineral and urban sites particularly on the west bank.

CONTEXT

Regional: Greensand Belt

Condition

	low	moderate	high
good	REINFORCE	CONSERVE & REINFORCE	CONSERVE
moderate	CREATE & REINFORCE	CONSERVE & CREATE	CONSERVE & RESTORE
poor	CREATE	**RESTORE & CREATE**	RESTORE

Sensitivity

LANDSCAPE ANALYSIS

Condition

Visual unity is incoherent and there are many detracting features. Views are contained by the surrounding Downs but the wide tidal river valley landscape is fragmented by extensive industrial works, floodplain management structures, new riverside residential developments and valley side quarries. Clusters of habitat include wet pasture reed beds and regenerative scrub, but industrial, residential and quarrying activities fragment the ecological interest overall. Aylesford Priory ragstone and flint churches and historic floodbanks are important heritage features, but field boundaries and tree cover are in poor condition, The built development generally detracts from the landscape, with massive industrial complexes, dramatic chimneys and high density residential areas in highly coloured brick. Overall, this is a landscape in very poor condition.

Sensitivity

The strength of character is weak with a lack of local distinctiveness and, in many areas, only a relatively recent time depth. Landform is an apparent element and the lack of significant tree cover creates a highly visible landscape.

LANDSCAPE ACTIONS

Restoration and creation of unimproved pastures and reed beds should be used to increase the nature conservation potential and naturalistic landscape qualities of the river floodplain.
Tree planting proposals need careful consideration to avoid destroying the open character of the landscape. Scrub and hedges may be more appropriate in integrating the built developments into the valley.
Where they are in a manageable context, existing hedgelines should be gapped up and properly maintained. New hedgerow proposals should aim to link existing remnant hedgerows.
Where appropriate, new developments should be sensitively sited and designed to reflect the riverside context.

SUMMARY OF ANALYSIS

Condition	**Very Poor.**
Pattern of elements:	Incoherent.
Detracting features:	Many.
Visual Unity:	Significantly Interrupted.
Cultural integrity:	Variable.
Ecological integrity:	Weak.
Functional Integrity:	Weak.

Sensitivity	**Moderate.**
Distinctiveness:	Indistinct.
Continuity:	Recent.
Sense of Place:	Very Weak.
Landform:	Apparent
Extent of tree cover:	Open
Visibility:	High.

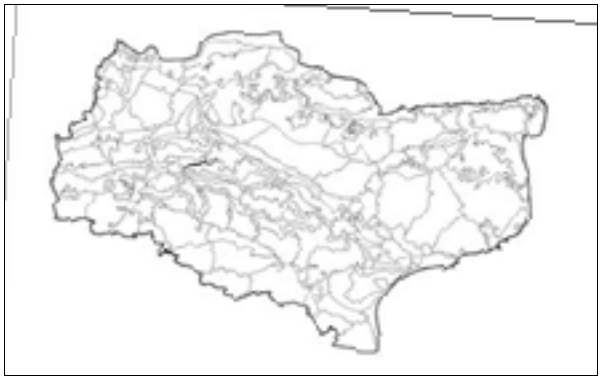
SUMMARY OF ACTIONS

RESTORE AND CREATE.

Restore and create pasture and reed beds
Use scrub and hedgerows to integrate built developments
Gap up and maintain existing hedgerows
Link existing hedgerows with new hedges
Site new developments sensitively

previous <<

MEDWAY VALLEY UPPER



The Upper Medway extends from Nettlestead where the river begins its journey through the Greensands to the southern outskirts of Maidstone at Tovil. The deep valley sides that the river has cut through these strata provide one of the most picturesque landscapes of the Medway, notably where it flows beneath the striking historic bridging points.

This stretch of the river forms part of the Medway navigation from the tidal lock at Allington to Leigh near Tonbridge. Perhaps the most important use of the river is for recreation, although before the coming of the railway it was also significant for commercial traffic. Boating, canoeing, and fishing as well as walking dominate the activities. Several moorings and boat yards are available between Wateringbury and Allington.

There is concern that erosion of the banksides by powered vehicles occurs when they are driven at excessive speed and that some owners dispose of untreated effluent and rubbish into the river. Dominance of stretches of the river footpaths by fishermen can also cause conflict with canoeists and wildlife because of the danger of lines and litter.

The maintenance of water levels for navigation through the use of locks has resulted in algal blooms and associated water quality problems in past years, particularly in summer.

Further, continued dry summers could result in surface flows becoming more seasonal in the headwater streams that feed the Medway.

Beyond the river channel the landscape has changed markedly over the past thirty years due to the reduction in fruit and hops that are grown, with their distinctive high hedges or windbreaks, and due to the expansion of the suburbs of Maidstone. This has resulted in a reduction in enclosure and visual variety, opening out views to the suburbs.

The land use change has also corresponded to a fragmentation in landholdings, for instance at Tutsham Hall, Court Lodge and Gallant's Farm, and the gentrification of associated buildings such as oast houses, most of which have now been converted for residences. These changes are still progressing, although less dramatically.

next >>

Kent County Council

Western Thames Marshes
Western Thames Marshes
Eastern Thames Marshes
Medway Marshes
Hoo Peninsula
North Sheppey
North Sheppey
Dartford and Gravesend Fringes
Dartford and Gravesend Fringes
Dartford and Gravesend Fringes
Swanley Fringe
Darenth Downs
Darenth Downs
Southfleet Arable Lands
Shorne
Swale Marshes
Swale Marshes
Medway Marshes
Medway Marshes
Medway Marshes
Lower Darent Valley
Swanley Fringe
Cobham: West Kent Downs
Swanley Fringe
Swale Marshes
Thanet
Thanet
Fruit Belt
Luddesdown: West Kent Downs
The Eastern Scarp: Medway
Ash Downs
Eastern Swale Marshes
Eastern Swale Marshes
East Kent Horticultural Belt
North Darent: Darent Valley
Medway Valley Lower
Nashenden Valley: Mid Kent Downs
Capstone Downs
The Blean
East Kent Horticultural Belt
The Wantsum and Lower Stour Marshes
Kent Downs Medway, Western & Eastern Scarp
Kent Downs Medway, Western & Eastern Scarp
Kingdom: West Kent Downs
The Western Scarp: Medway
The Stour Valley
Knockholt Downs
Chatham Outskirts: Mid Kent Downs
Eastern Fruit Belt
Hollingbourne Vale West
Boxley Vale: Medway
The Stour Valley
Knockholt: Darent Valley
Wrotham Heath -Ryarsh Gap
Wrotham Heath-Ryarsh Gap
Kemsing Vale - Kent Downs
Kemsing Vale
North Kent Fruit Belt
East Kent Horticultural Belt
Greensand Fruit Belt - Malling
Hollingbourne Vale West
Bicknor: Mid Kent Downs
Faversham Fruit Belt: Mid Kent Downs
North Kent Fruit Belt
West Darent: Darent Valley
Mereworth Woodlands
North Kent Fruit Belt
Greensand Ridge - Plaxtol
Greensand Ridge - Plaxtol
The Stour Valley
East Kent Arable Belt
Ightham Greensand: Sevenoaks Ridge
Medway Valley Upper
Greensand Fruit Belt - Maidstone
Leeds-Lenham Farmlands
Hollingbourne Vale West
Westerham Greensand: Sevenoaks Ridge
Greensand Fruit Belt - Wateringbury
Challock: Mid Kent Downs
Chilham: Stour Valley
Eastern Low Weald: The Low Weald
Greensand Ridge - Plaxtol
Valeside Farms and Parklands
Hollingbourne Vale East
Coxheath Plateau Farmlands
East Kent Arable Belt
Western Low Weald: The Low Weald
Hildenborough-Leigh Farmlands
Greensand Ridge - Maidstone
Low Weald Fruit Belt
Valeside Farms and Parklands
Wye: Stour Valley
Petham: East Kent Downs
Western Wooded Farmlands
Sutton Valence to Pluckley Mixed Farmlands
Greensand Fruit Belt - Egerton
Hollingbourne Vale
Hothfield Heathy Farmlands
The Stour - Stour Gap
Elham: East Kent Downs
South Foreland
Hildenborough-Leigh Farmlands
Medway Valley
Eden Valley
Medway Valley
Staplehurst-Headcorn Pasturelands
The Stour - Stour Valley
Low Weald Fruit Belt
Low Weald Fruit Belt
Beult Valley
Upper Stour Valley
Hampton: Stour Valley
Biddenden-High Halden Wooded Farmlands
Kent Water: Upper Medway
Pembury: Central High Weald
Teise Valley
Brabourne Vale
Penshurst: Central High Weald
Staplehurst-Headcorn Pasturelands
Brabourne Lees Mixed Farmlands
Alkham: East Kent Downs
Kent Fruit Belt: Kentish High Weald
Mersham: Farmlands
Stowting: Postling Vale
Bayham: Central High Weald
Bethersden Farmlands
Folkestone Outskirts: Postling Vale
Sissinghurst Wooded Farmlands
Biddenden-High Halden Wooded Farmlands
Upper Stour Valley
Sellindge Plateau Farmlands
Saltwood: Postling Vale
Aldington Ridge
Bewl and Bedgebury: Kentish High Weald
Cranbrook: Kentish High Weald
Old Romney Shoreline Wooded Farmlands
Aldington: Lympne
Hythe Escarpment: Lympne
Romney Marsh: Lympne
Romney Marsh Settlements
Shirley Moor
Romney Marsh Settlements
Romney Marsh Settlements
Romney Marsh Mixed Farmlands
Bodiam: Lower Rother Valley
Oxney: Lower Rother Valley
Highknock Channel and Dowels
Brookland Farms
The Romney Coast
Walland Marsh Farmlands
Dungeness Shingle

Natural Areas

- Greater Thames Estuary
- High Weald
- London Basin
- Low Weald
- North Downs
- North Kent Plain
- Romney Marshes
- Wealden Greensand

Natural Area Map

N

7.5 3.75 0 7.5 Kilometres

JACOBS BABTIE

6.0 HOW WE PRODUCED THE LANDSCAPE ASSESSMENT OF KENT

The methodology used to undertake judgments on the landscape assessment is based on the Countryside Agency and Scottish Natural Heritage's *'Landscape Character Assessment Guidance'*.

Local character areas have previously been identified across the county. These are described in the following reports that are collectively referred to as the Landscape Assessment of Kent.

- The High Weald (1994)
- The Kent Downs (1995)
- Thames Gateway, Eastern Swale Marshes and Eastern Fruit Belt (1995)
- The Low Weald Landscape Assessment & Guidelines (1997)
- The Greensand Belt Landscape Assessment & Guidelines (1998)
- North West Kent Landscape Assessment & Guidelines (1998)
- North East Kent Landscape Assessment & Guidelines (1998)
- Romney Marsh Landscape Assessment & Guidelines (1998)

These studies were undertaken over a number of years whilst landscape assessment methodologies were developing and therefore there is a need to bring them together on the same basis. The character areas have been revisited and minor amendments have been made to the boundaries to align with features on the ground to update them to conform to the current guidance. Field Assessment Sheets were then carried out; these have been designed to analyse the component factors of the landscape and to reach a series of decisions on the **Condition** and **Sensitivity** of each character area.

Condition is strongly influenced by the impact of external factors. The assessment of condition evaluates the pattern of the landscape and the presence of incongruous features on the unity of the landscape. It also evaluates how well the landscape functions as a habitat for wildlife and the condition of cultural or 'man-made' elements such as enclosure, built elements and roads. Urban fringe areas are often under pressure that can frustrate other land uses. This often means that these areas are described as being in a poor condition whilst other more remote areas may still have the same basic features but be in a better condition. It is therefore practical to assume that condition may vary throughout a character area so that any conclusions should be regarded as a summary of the overall situation. **Condition** is defined by an analysis of *Visual Unity* and *Functional Integrity* and is classified as very poor, poor, moderate, good and very good.

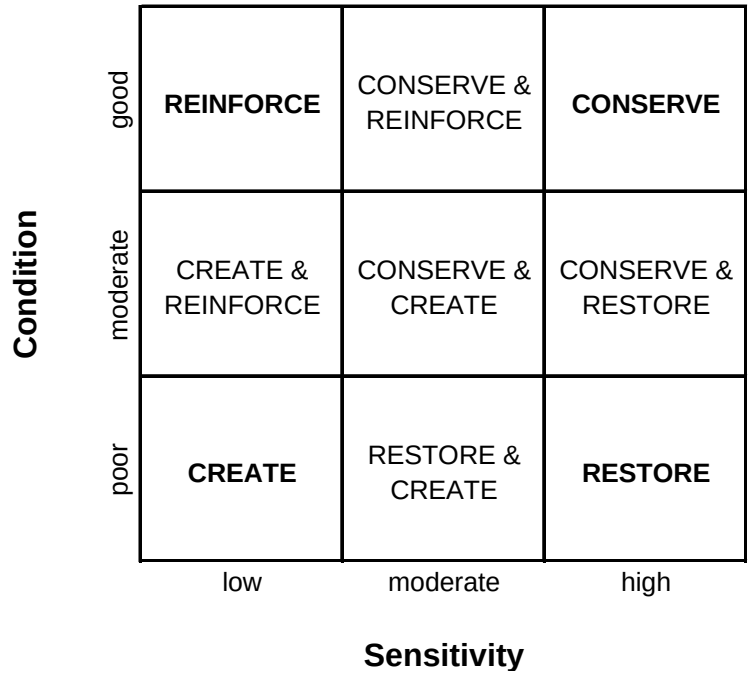
> **Visual Unity** is the result of an analysis of the *Pattern of Elem ents*, for example the pattern of vegetation, enclosure, settlement, and the relationship of these to the landform etc., weighed against the number of Detracting Features in the landscape.
>
> **Functional Integrity** is an assessment of how the landscape functions and considers both the influence of man (*Cultural Integrity*) and nature (*Ecological Integrity*).

Sensitivity is a measure of the ability of a landscape to accept change without causing irreparable damage to the essential fabric and distinctiveness of that landscape. The term change refers to both beneficial changes such as a new woodland as well as change that

may be brought about by new land uses. **Sensitivity** is defined by an analysis of *Sense of Place* and *Visibility* and ranges from very low through low, moderate, high and to very high.

> **Sense of Place** balances *Distinctiveness* with *Time depth*. Distinctiveness is defined by how much the key characteristics contribute to a sense of place. For example in a landscape where hedgerows are a key characteristic if the network is intact the landscape can be described as distinct or 'characteristic'. Some landscapes have features that may be considered unique or rare and these will obviously contribute to a strong sense of place. Time depth ranges from recent, through historic to ancient and reflects how long that landscape has taken to establish. Ancient landscapes are uncommon in Kent but include those that have had very little intervention by man or contain ancient or prehistoric features. Historic landscapes are generally from the medieval period onwards. This is when the pattern of most landscapes in Kent was established and is generally discernible today (although overlain with modern features). Recent landscapes are those where historic elements have been replaced with new elements or land management. They include reclaimed landscapes.
>
> **Visibility** addresses the issues of *Landform* and the intercepting feature of *Tree cover*. For example an open hilltop landscape has a higher visibility than an enclosed lowland landscape.

The conclusions reached regarding each of the character areas are expressed using a matrix that encompasses Condition and Sensitivity. This analysis gives a broad indication of each area's ability to accommodate a change in management or use without loss of overall integrity. The matrix helps to assist in the direction of any policy that might be applied to the land in question.



The combination of condition and sensitivity assessments has generated appropriate actions for each character area:

Although conclusions have been reached for each of the character areas, it is not the purpose of this study to rank one character area against another. Likewise this study is not intended to identify in detail areas suitable for development. It may however offer guidance to both the local planning authority and developers when deciding the type and scale of development that may be appropriate whilst respecting the character of the landscape.

Conserve - actions that encourage the conservation of distinctive features and features in good condition.

Conserve and reinforce - actions that conserve distinctive features and features in good condition, and strengthen and reinforce those features that may be vulnerable.

Reinforce - actions that strengthen or reinforce distinctive features and patterns in the landscape.

Conserve and restore - actions that encourage the conservation of distinctive features and features in good condition, whilst restoring elements or areas in poorer condition and removing or mitigating detracting features.

Conserve and create - actions that conserve distinctive features and features in good condition, whilst creating new features or areas where they have been lost or are in poor condition.

Restore - actions that encourage the restoration of distinctive landscape features and the removal or mitigation of detracting features.

Restore and create - actions that restore distinctive features and the removal or mitigation of detracting features, whilst creating new features or areas where they have been lost or are in poor condition.

Reinforce and create - actions that strengthen or reinforce distinctive features and patterns in the landscape, whilst creating new features or areas where they have been lost or are in poor condition.

Create - actions that create new features or areas where existing elements are lost or in poor condition.

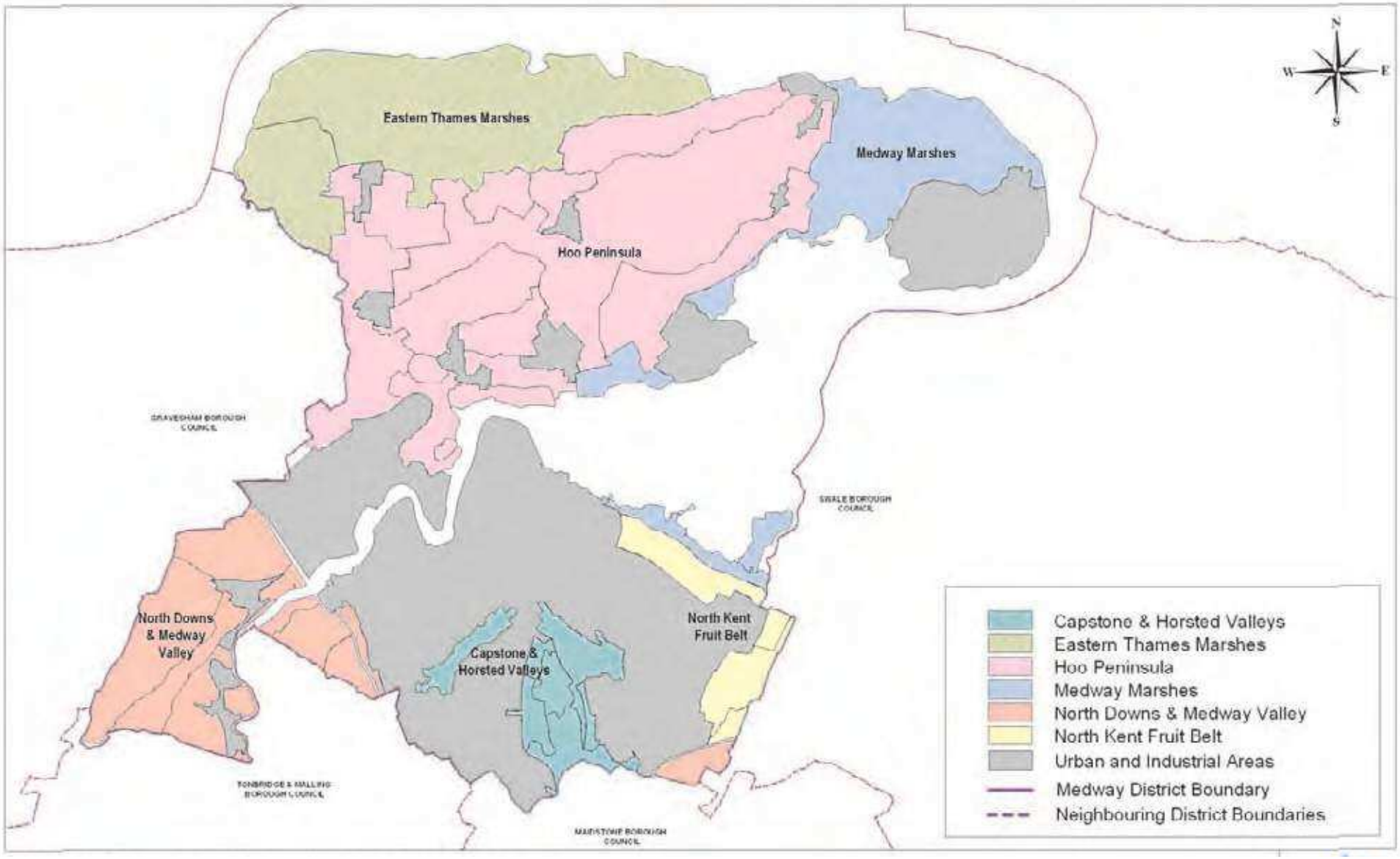
It has to be recognised that whilst the process adopts a complex but logical critique of the landscape many of the individual decisions are still based on the trained but subjective judgments of the assessors. However by simplifying the conclusions into a series of generic actions it is possible to reach informed and well supported judgments on the landscape character.

Actions are offered that are locally appropriate to the character area and respond to the generic actions that have been identified. Many of these actions are not within the remit of the Local Authority to implement directly as they are not responsible for managing the land in most cases. Such references are included with the view to influencing opinions, generating support and guiding policy. In many instances certain forms of land management have a strong influence on the landscape character. These are often dependent on market forces and land management practices for their retention e.g. sheep grazing on marshland and fruit production.

Medway Landscape Character Assessment

March 2011

Principal Landscape Areas



- *Thames Gateway* The Kent Thames Gateway Landscape (KTGLA) – Landscape Assessment and Indicative Landscape Strategy (July 1995)
- *Local* Medway Landscape and Urban Design Framework (LAUD) – Landscape and Townscape Character Assessment (May 2001)

A review by Council Officers of two of these studies (KTGLA and LAUD) concluded that The Kent Thames Gateway Landscape study adopted a more informative approach and could usefully provide the basis for a new study of the Medway countryside and urban-rural fringe areas. This 1995 study predates current national guidance produced in 2002 (The Landscape Character Approach: Countryside Agency); however the approach taken is broadly within the guidelines. The process of updating and reviewing the Medway LCA has ensured that currently accepted methodologies and guidance have been observed. Natural England are currently preparing an updated LCA guidance document for England.

St Mary's Farmland

Methodology and Analysis

Desk top study

As a first stage, the Kent Thames Gateway Landscape Assessment (KTGLA) character areas and the Medway Landscape and Urban Design Framework (LAUD) character areas were mapped separately as overlays on top of the Landscape Assessment of Kent (KCA) character areas. This identified key relationships and areas of conflict within each study. It also helped to confirm an agreed consensus that the KTGLA was the more useful and appropriate study to form the basis of a new landscape character study. Appendix E illustrates this mapping exercise.

As a second stage the KTGLA character areas were overlaid over a series of maps that included geology, soils, topography and protective designations. This helped in understanding previous decisions related to character area boundaries and provided an opportunity to consider and review these boundaries. Decisions on character area boundaries within Medway to the south of the Thames Gateway area were strongly influenced by the conclusions of the KCA study; proposed boundaries for these areas were also mapped over the geology, soils and other mapping as listed above. In order to address cross boundary issues the Swale, Gravesham and Maidstone Borough Council LCAs were reviewed and face to face meetings took place with officers from Maidstone, Gravesham and Tonbridge and Malling. Tonbridge and Malling do not currently have their own LCA but are in the process of planning to produce one.

Fieldwork

Site survey fieldwork was undertaken between the months of January and March 2009. Some follow-up work took place in the subsequent period – to visit more inaccessible areas, to ratify results and to check conflicts. All visits were undertaken by Medway's Landscape Officer assisted by a Chartered Consultant Landscape Architect. On the few occasions the consultant was unavailable a

technical officer partnered the Landscape Officer. The Landscape Officer visited all character areas.

Site Assessment Methodology
Boundaries were reviewed and principal routes and viewpoints visited within each character area, prior to completion of a site assessment sheet (see Appendix D); this was completed at a carefully selected survey point. The format and approach adopted for these sheets was based on best practice with reference to (1) Countryside Agency guidance and (2) Condition and Sensitivity assessment techniques used for the Landscape Assessment of Kent (as well as Landscape Assessments produced by a number of neighbouring Kent authorities, including Swale, Maidstone and Gravesham). See Appendix C for a summary of the approach taken to assessing Condition and Sensitivity. See Appendix D for an example of a completed survey sheet

Boundaries
It should be noted that boundaries are often indicative of transitional rather than arbitrary zonal change. In different cases they can be defined by man made or natural boundaries – e.g. motorways and roads, industry and settlements, watercourses, woodlands and topography. The boundaries may therefore indicate in different cases an abrupt or more gradual transition from one zone to another.

The site and analysis work gave due consideration to landscape character areas that extended beyond the district boundaries of Medway into neighbouring authorities and this included a review of local Landscape Character Assessments for these authorities (where these existed). All neighbouring authorities have been consulted. As a result of these consultation responses it was decided that character areas boundaries should terminate at the Medway boundary; thereby allowing neighbouring authorities to make final judgements on their own local landscape character area designations.

Landscape types
Landscape types are divided into two broad categories – rural and transitional. These are further sub-divided into types and sub-types. In the Thames Gateway study (KTGLA), areas were identified according to landscape type. Whilst these categories remain, each character area has now been clearly identified by the adoption of a locally distinctive name. A summary of the classification of landscape types can be found in Appendix B.

Content and Structure
Medway's countryside is divided up into a number of distinct landscape areas. These areas broadly match areas identified within The Landscape Assessment of Kent (2004). They form a logical framework which then sub-divide into more detailed landscape character areas. The six principal areas defined within this study are: the Eastern Thames Marshes, Medway Marshes, Hoo Peninsula, North Kent Fruit Belt, Capstone and Horsted Valleys, North Downs and Medway Valley. The structure of the report reflects these categories.

The following subject headings have been considered for each survey sheet. The results are summarised on each character area summary sheet.

Description and Characteristics
General description (including location, geology, soils, accessibility, designations) and key distinguishing characteristics

Condition and Sensitivity
Assesses Condition and Sensitivity based on a commonly accepted approach – see Appendix C for a fuller explanation. Condition can vary widely within a particular character area. A judgement is made based on an assessment of overall condition across the whole character area. Exceptionally wide variation or unusual features/influences are highlighted within individual area assessments. Levels of sensitivity may also vary across a particular character area and a judgement is made based on an assessment of overall sensitivity across the whole character area.

Actions
A matrix grid is used to balance condition and sensitivity. This provides nine different management option categories. This approach gives a broad indication of each character area's ability to accommodate a change in management or use without a loss of overall integrity. Some character areas could vary in condition and sensitivity outcomes when considered at a finer grain but may nevertheless retain a degree of coherency in terms of their overall characteristics. The character assessment approach provides the opportunity to undertake more detailed studies on condition, sensitivity and capacity for change for individual application sites. This approach would be encouraged, particularly for sensitive sites; however this work should be undertaken within the context (i.e. the framework and conclusions) of this assessment. It should be undertaken by a competent and skilled landscape professional and it should follow currently recognised Landscape Character Assessment procedures and methodologies.

Issues
This section seeks to identify particular issues that are specific to each character area. A summary of recurring and more generic issues is provided within introductory sections. It is intended that the Guidelines sections provide pro-active responses to the issues raised for each character area.

Guidelines
This section seeks to address principal issues and put forward a set of specific, realisable and pro-active management actions. These actions should mitigate trends that degrade locally distinctive landscape character and

encourage positive action to enhance and raise landscape quality and condition. Achieving the objectives outlined in the guidelines may not always be a simple process; however it is intended that highlighting objectives in this way will focus attention of landowners, planning officers, developers and the local community on a clear aspiration to improve the condition of the landscape in a pro-active and positive way set that is set within an overall framework and consistency of approach. The guidelines should provide an appropriate landscape framework for new development in the countryside and urban-rural fringe areas of Medway and encourage and support separate green infrastructure initiatives. A good example of this would be providing a wider green infrastructure framework to support the development of a sustainable new community at Lodge Hill. This aim can only be achieved through a multi-agency approach, drawing together funding and support from key stakeholders like the Environment Agency, Natural England and English Heritage and obtaining financial and practical support for this approach from central government. An existing mechanism is in place to achieve this multi-agency approach through the Parklands funding regime, which is led within the Medway, Swale and Dartford and Gravesham districts by Greening the Gateway Kent and Medway (GGKM).

These guidelines are intended for use by Planning Officers when considering planning applications but are also for use to support and inform discussions with individual landowners as part of strategic landscape, biodiversity, cultural heritage and access enhancement initiatives that are being initiated within the Thames Gateway (as led by GGKM and Natural England. More detail on delivery mechanisms is provided in the following section.

A series of guidance sheets will be produced to support this study. This guidance will seek to reverse trends highlighted within the summary sheets that have led to an erosion of local distinctiveness and rural character. In many cases such adverse impacts are related to the introduction of equine related activities[3] and hard and soft landscape boundary treatments[4] considered in many cases as insensitive to their context. Guidance notes on Equine Management and Boundary treatments are likely to be produced first. A wider holistic study will also be produced that considers urban and rural settlement edges within Medway. This study will seek to ensure that new and existing developments are more sensitively integrated into the surrounding countryside. A biodiversity study linked to this current LCA is recommended within the next section. A timetable to complete these projects will be subject to identification of adequate resources to fund the work. In the meantime useful guidance on the first two topics can be found within the Kent Downs AONB Landscape Design Handbook and Equine Management Guidance (see Bibliography section).

Footnotes

1. The Great and Lower Lines is a high valued and distinctive landscape designated as an ALLI within the current Local Plan. This large open space (now named Great Lines Heritage Park) is surrounded by development, has been categorised as an urban open space rather than countryside and is therefore outside the scope of this study. This does not devalue its considerable significance as a metropolitan open space with high biodiversity and cultural value. It has been the subject of a number of detailed landscape and other assessments in recent years and the area forms part of a current bid for World Heritage Site status (for the Chatham Historic Dockyard and its defences). It is well protected within the current local plan as an open space, for its wildlife value and it also sits within a Conservation area. Thames Gateway Parkland funding is currently being spent on landscape enhancements to this area. Despite its urban location, this open space has great value and potential for improvement as part of a green lung linking the countryside to the south into Medway and should be considered in Green Infrastructure terms for its potential to form a stronger link between the densely populated urban areas of Chatham and Gillingham and the open spaces of the Capstone and Horsted Valleys and the North Downs beyond. The eastern section of the area described as Cuxton Brickfields within the Local Plan and designated as an ALLI (land to the east of the M2), has been excluded from this study, on the basis that it has a predominantly urban character. A significant section of this area has now been developed as a theme park, but it remains the intention of the planning authority that the whole of this area retains an open character that respects its importance as a prominent green backdrop, wildlife corridor and green lung extending from the countryside into the urban area.
2. It is recommended that future updated LCA studies in Medway include a section that considers change in landscape condition over time – from previous studies, but also in the context of time depth / historic landscape character. An updated Landscape Character Assessment Guidance document is currently being prepared by Natural England. This will address current thinking and examples of best practice in LCA.
3. There are a number of references within this study on the adverse impacts of equine related activities on the landscape. These relate to visual and landscape character impacts. Typical adverse impacts may relate to the lotting of agricultural land (reducing larger fields into smaller units not in character with the historic field pattern) or the introduction of unsightly and insensitive boundary treatments. These issues need to be judged on a case by case basis but useful guidance on good practice may be found within the Kent Downs AONB Equine Management Guidance document (see Bibliography section).
4. Hard and soft landscape boundary treatment guidance would consider ways to achieve sensitive rural landscape treatments and remedy the gradual trend towards suburbanisation in many areas (especially along road corridors – often described as ribbon development). Typical adverse impacts are the introduction of suburban features like conifers, close board fences, ornamental shrub planting etc.

North Downs and Medway Valley

Principal characteristics

North Downs

- Wooded scarp top and steep wooded sides with large open arable fields to lower slopes; rolling dry valleys with strong woodland and landform containment ; distinctive heritage features include Pilgrim's Way, historic lanes and farm settlements
- High biodiversity value contained in ancient woodlands, chalk grasslands and regenerating chalk quarries
- Distinctive and dramatic long open views are marred in places by detracting features along valley floor – roads, quarries, industry etc
- Character areas overlap to south and west into neighbouring boroughs – Tonbridge and Malling, Gravesham and Maidstone*
- See Kent Downs AONB website, Management Plan and other guidance documents for more detail on the distinctive features of the North Downs

Medway Valley

- Mixture of lower scarp slope and valley floor mixed farmland; fragmented by several disused and inaccessible quarries with regenerating woodland edges that help to screen visual impacts
- Pockets of grazed marshland with flood defence walls and reed beds; boundary treatments in variable condition; areas generally retain rural character but with rural fringe intrusions and some detracting features
- Landscape heavily fragmented by historic land uses associated with chalk extraction industries; includes quarries; railway lines; busy roads; settlements; old wharfs; marinas, mobile homes, industrial areas etc.

Principal issues

North Downs

- The North Downs landscape within the Medway area is under considerable pressure on account of its proximity to densely populated urban areas and many busy roads (including the M2 motorway); the highest level of designation for landscape protection ensures that all development proposals are subject to careful scrutiny
- Protection of Nashenden Scarp from pressure of new development; this escarpment is valued as a distinctive green backdrop and gateway feature for the Medway urban area; chalk grassland; highly visible from motorway and North Downs
- Considering the inter-connectivity of woodland and downland links into neighbouring boroughs to the south and west of Medway

Medway Valley

- On-going threat of landscape fragmentation with loss of rural character and local distinctiveness caused by the intrusion of inappropriate urban fringe activities – particularly threatened and damaged areas are on western side of river and include Cuxton Scarp Foot, Halling Quarries, Halling and Holborough Marshes
- Medway Valley – the disused pits offer regeneration opportunities for development, recreation and biodiversity improvements
- Industrial heritage within Medway Valley forms part of local distinctiveness of area
- Current regeneration proposals include a new development scheme for the Halling Cement Works site and proposals for new road and bridge across Lafarge Cement Works site at Holborough; forms link to Tonbridge and Malling's Peter's Pit development

* Two small woodland areas (previously designated as ALLIs within the Local Plan) are located on fringes of urban areas at Walderslade; these extend into larger green spaces within neighbouring districts and are not identified as distinct character areas within this study. See Matt Hill Farmland summary sheet for an analysis of these areas

36 Cuxton Scarp Foot

Landscape type: Rural fringe (T1)
Sub-types: Rural fringe with urban/industrial influences (T1c)
Medway Valley Lower (KCA 2004)

Description

- Location – north of river Medway and west of M2 motorway
- Geology – Upper and Middle Chalk
- Soils – Grade 3 and undefined
- Accessibility – one principal route bordering rail line links urban area with Cuxton
- Designations – ALLI; Strategic gap; safeguarded corridor for M2 widening; safeguarded route for CTRL; SNCI
- Flood – southern half within flood zone (2003)

Characteristics

- Visually prominent area rising from marshes alongside River Medway up to Kent Downs AONB
- Prominent in views from many directions (including A228, M2, CTRL, Medway Valley Railway and the Medway River); has significant potential as an inviting 'gateway' into the urban areas of Medway
- Includes farmland to north along scarp foot and lower lying marshland to south
- Includes land affected by M2/CTRL works; adverse impacts persist in areas adjacent to this development
- Lagoons in marshland area to south-east created as part of mitigation for CTRL works
- Area has fragmented character from urban fringe land uses, motorway and railway line; land uses include rough grazing pasture; marshland; woodland; site of nature conservation interest; sewage works; landfill/waste site; derelict land; caravan site
- Railway line creates strong severance – restricts accessibility to marshland and marina
- Mixed containment (footpath link and woodland) and openness (marshland and farmland)
- Strong urban fringe intrusion with overall degraded condition, includes areas of fly-tipping
- Openness maintains separation between urban areas, M2 and CTRL and Cuxton Village; helps to retain local identity and enhance village setting
- Provides visual link and balance with Kent Downs AONB on adjacent side of river

Analysis

Condition ***Poor***
Pattern of elements – Incoherent
Detracting features – Many
Visual Unity – Fragmented
Ecological integrity – Moderate
Cultural integrity – Variable
Functional integrity – Moderate

Sensitivity ***Moderate***
Distinctiveness – Distinct
Continuity – Historic
Sense of place – Moderate
Landform – Dominant
Tree cover – Intermittent
Visibility – Moderate

Actions ***Restore and Create***

Issues

- Managing urban fringe intrusion/activities including fly-tipping
- Restricted access beyond main footpath link
- Main footpath unattractive and intimidating (see General Notes for further information)
- Off-road cycle path opportunity
- Severance of M2; weak and unattractive pedestrian/cycle links into urban areas to north
- Opportunity to enhance 'Gateway' potential of area
- Marina site has been built up with imported materials; developed character not in sympathy with marshland context

Guidance

- Introduce safety/enhancement plan for public right of way – to include vegetation clearance and active management to control anti-social activities
- Review cycle path opportunities linking urban areas to countryside
- Improve path network and pedestrian links through area, onto valley sides and into urban areas to north
- Restore and improve chalk grassland areas to north
- Improve boundary treatment to eyesores – including screen to sewage works entrance; replace galvanised steel palisade boundary fencing with more sympathetic style and finish of security fencing; screen with native planting where possible
- Protect and enhance natural marshland character along river edges as appropriate setting for adjacent river and AONB
- Restore and actively manage hedgerows along field, path and road boundaries and strengthen woodland blocks
- Resist development and urban fringe activities that could lead to further degradation of condition, accessibility and rural character of area
- Seek to develop 'gateway' potential of area; landscape enhancements to M2/A228 roundabout and approach roads could achieve step change in arrival experience of visitors into Medway

General Notes

- Strategic gap designations omitted and replaced by policy KTG1(x) in South East Plan. This policy seeks to avoid coalescence with adjoining settlements to the south of Medway
- Historic note. CTRL recorded a small Anglo Saxon barrow cemetery located on a prominent part of the slope so that it would be visible for a long way around. This is a common feature of such sites
- Medway Port Marina wish to divert a section of footpath (RS206) between Cuxton Station and Factory Cottages to the other side of the railway track. This application is currently being considered by the Rights of Way Section